

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SUMMARY COVER SHEET TO THE SECOND INTERIM FEE APPLICATION OF
CROWE & DUNLEVY, P.C. AS CO-COUNSEL TO THE DEBTOR FOR THE FEE
PERIOD FROM MAY 16, 2023 THROUGH DECEMBER 31, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant's Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	Docket No. 104	
Interim Application (X) No. 2 Final Application ()	Second Interim	
	Beginning of Period	End of Period
Time period covered by this Interim Fee Application for which interim compensation has not previously been awarded:	05/16//2023	12/31/2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? Yes		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? Yes		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? Yes		
Do expense reimbursements represent actual and necessary expenses incurred? Yes		
Total professional fees requested in this Application: 2,135,516.00		
Total professional hours covered by this Application: 4,041.50		
Average hourly rate for professionals: \$528.40		
Total paraprofessional fees requested in this Application: \$104,661.00		
Total paraprofessional hours covered by this Application: 386.40		
Average hourly rate for professionals: \$270.86		
Total fees requested in this Application: \$2,240,177.00		
Total expense reimbursements requested in this Application: \$88,126.63		
Total fees and expenses requested in this Application: \$2,328,303.60		
Total fees and expenses awarded in all prior Application: 1,880,268.20		

Plan Status: The Debtor filed a chapter 11 plan of reorganization. The Debtor remains focused on coalescing consensus across their capital structure for a value-maximizing Plan and are engaging with their key stakeholders regarding a consensual restructuring.

Primary Benefits: During the Fee Period, in conjunction with co-counsel, C&D diligently represented the Debtor on a wide variety of complex restructuring matters that helped the Debtor smoothly transition into chapter 11. C&D, in conjunction with co-counsel, advised the Debtor on matters related to Second day motions, resolution of vendor issues, preparation of second day motions, and the local procedures and practice in this District. C&D assisted in drafting and organizing all professional retention applications and coordinating a fee application process. In conjunction with co-counsel, C&D advised on lease matters, including issues related to lease rejection and assumption, and was actively involved in formulating a lease negotiation plan and drafting lease amendments.

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Crowe & Dunley, P.C. (“C&D”), co-counsel to the debtor and debtor-in-possession Alexander E. Jones (“Jones” or “Debtor”), hereby submits its *Second Interim Fee Application for Allowance and Payment of Fees and Expenses as Co-Counsel to the Debtor for the Period From May 16, 2023 Through December 31, 2023* (the “Application”) for interim allowance of (a) compensation in the amount of \$2,240,177.00 for professional services C&D rendered to the Debtor from May 16, 2023 through December 31, 2023 (the “Fee Period”) and (b) reimbursement of actual and necessary expenses in the amount of \$88,126.63 that C&D incurred during the Fee Period.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Application, C&D attaches the following exhibits:

EXHIBIT	DESCRIPTION
A.	Notice of Crowe & Dunlevy, P.C.’s Fifth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Co-Counsel to the Debtor for the Period from May 16, 2023 Through May 31, 2023 [Docket No. 427]
B.	Notice of Crowe & Dunlevy, P.C.’s Sixth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Co-Counsel to the Debtor for the Period from June 1, 2023 Through June 30, 2023 [Docket No. 428]
C.	Notice of Crowe & Dunlevy, P.C.’s Seventh Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Co-Counsel to the Debtor for the Period from July 1, 2023 Through July 31, 2023 [Docket No. 429]
D.	Notice of Crowe & Dunlevy, P.C.’s Eighth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as

	Co-Counsel to the Debtor for the Period from August 1, 2023 Through August 31, 2023 [Docket No. 454]
E.	Notice of Crowe & Dunlevy, P.C.'s Ninth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Co-Counsel to the Debtor for the Period from September 1, 2023 Through September 30, 2023 [Docket No. 486]
F.	Notice of Crowe & Dunlevy, P.C.'s Tenth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Co-Counsel to the Debtor for the Period from October 1, 2023 Through November 30, 2023 [Docket No. 532]
G.	Notice of Crowe & Dunlevy, P.C.'s Eleventh Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Co-Counsel to the Debtor for the Period from December 1, 2023 Through December 31, 2023 [Docket No. 599]

2. Although every effort has been made to include all fees and expenses incurred during the Fee Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with title 11 of the United States Code, the Federal Rules of Bankruptcy Procedure, the Bankruptcy Local Rules for the Southern District of Texas, and the Interim Compensation Order.

3. C&D requests that this Court enter an order (a) granting interim allowance of compensation for professional services rendered by C&D during the Fee Period in the amount of \$2,240,177.00, (b) granting reimbursement of actual and necessary expenses incurred by C&D during the Fee Period in the amount of \$88,126.63, (c) authorizing and directing the Debtor to pay the fees and expenses to C&D as requested, less any fees and expenses previously paid pursuant to the Interim Compensation Order, for the Fee Period, and (d) granting such other and further relief as is just and proper.

Houston, TX

Dated: February 5, 2024

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

2525 McKinnon St., Suite 425

Dallas, TX 75201

Telephone: 737.218.6187

Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on February 5, 2024, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

Fifth Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**FIFTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
MAY 16, 2023 THROUGH MAY 31, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	05/16/2023	05/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$144,973.60 ¹ (80% of \$181,217.00)	
Total Reimbursable Expenses Requested in this Statement:	\$4,645.13 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$169,484.00	
Total Actual Attorneys Hours Covered by this Statement:	411.90	
Average Hourly Rate for Attorneys:	\$411.47	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$11,733.00	
Total Actual Paraprofessional Hours Covered by this Statement:	42.6	
Average Hourly Rate for Paraprofessionals:	\$275.42	

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Fifth Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from May 16, 2023 through May 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$144,973.60 (80% of 181,217.00) as compensation for professional services rendered to the Debtor during the period from May 16, 2023 through May 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$4,645.13, for a total amount of \$149,618.73 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughttry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$181,217.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$4,645.13 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$149,618.73³ which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

³ Such payment to be made first from any existing retainer funds held by C&D for the Debtor.

Houston, TX
Dated: August 31, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 737.218.6187
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on August 31, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	3,359.53
Litigation support vendors	832.00
Online Research	453.60

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	18.4	11.2
B120 Asset Analysis and Recovery	8.7	0.0
B130 Asset Disposition	0.00	0.0
B140 Relief from Stay/Adequate Protection	1.7	0.00
B150 Meetings of & Communications with Creditors	0.00	0.0
B160 Fee/Employment Applications	32.0	8.1
B170 Fee/Employment Objections	13.5	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	2.5	0.0
B190 Other Contested Matters	246.2	23.3
B195 Non-Working Travel	11.8	0.00
B210 Business Operations	66.2	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.00
B240 Tax Issues	.5	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	0.00	0.00
B320 Plan and Disclosure Statement	5.9	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	411.9	42.6

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

May 31, 2023
Invoice # 761710

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$181,217.00
Current Invoice Total Expenses	<u>\$4,645.13</u>
Current Invoice Total	<u>\$185,862.13</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 761710 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

Page 2
May 31, 2023Client # 50134
Matter # 00802Invoice # 761710
Responsible Attorney
Vickie L. Driver

Post - petition

05/16/2023	C. Blacklee	B190/	Review and analyze voice notes from Alex Jones' cell phone	1.60
05/16/2023	J. Booth	B190/	Determine responsiveness of recently produced documents to confirm production was in response to the UCC's 2004 examination	0.10
05/16/2023	C. Craig	B190/	Develop strategy for addressing UCC's requests for document production (1.0); review and analyze client documents for privacy and privilege issues (1.0); evaluate status of document acquisition in response to UCC's requests (1.0); exchange correspondence with UCC regarding production by Debtor (1.0).	4.00
05/16/2023	C. Craig	B190/	Review and analyze pleadings from underlying state court actions to assist in drafting response to adversary Plaintiffs' motions for summary judgment	1.00
05/16/2023	C. Craig	B190/	Develop strategy for drafting responses to adversary plaintiffs' motions for summary judgment [NO CHARGE]	0.50

Jones, Alex "AJ"

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May 31, 2023Client # 50134
Matter # 00802Invoice # 761710
Responsible Attorney
Vickie L. Driver

Post - petition

05/16/2023	V. Driver	B110/	Review and revise stipulation on exemption objection (.4); review language in stip and approve same (.2); review initial book contract and send for production and inclusion in Schedule G. (.3)	0.90
05/16/2023	V. Driver	B120/	Coordinating refund from Pattis firm to dip account (.4); analyze Longevity issues and need for follow up (1.0).	1.40
05/16/2023	V. Driver	B160/	Emails with family law firm regarding need to employ if needing to be compensated for services during case.	0.60
05/16/2023	V. Driver	B190/	Calls with client on status of mediation and settlement strategy (.4); review and analyze document requests and vendor instructions on electronic data gathering (.8); review and revise cross notice for Cicak deposition and prepare for filing (.9); preparation for Cicak deposition (1.2); draft email to UCC transitioning lead on discovery to C. Craig (.3); call with TX plaintiff discussing settlement offer terms and potential response to same (.7); summarize same for team (.3).	4.60

Jones, Alex "AJ"

Page 4
May 31, 2023Client # 50134
Matter # 00802Invoice # 761710
Responsible Attorney
Vickie L. Driver

Post - petition

05/16/2023	A. Finch	B110/	Coordinate data collection with third-party vendor (Digital Mountain) (.6); Coordinate data collection with FSS staff (.9); review data re: UCC 2004 requests (4.5)	6.00
05/16/2023	A. Finch	B195/	Flight to Austin to meet with client (6.0 — billed at half time); drive to and from client's office (.6 — billed at half time)	3.30
05/16/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 16 Tuesday (4.0); summarize statements made related to case (.1)	4.10
05/16/2023	D. McClellan	B190/	Review and analyze MSJ brief of Texas plaintiffs	3.10
05/16/2023	D. McClellan	B190/	Review and analyze MSJ brief of Connecticut plaintiffs	2.20
05/16/2023	D. McClellan	B190/	Develop strategy and action items for MSJ responses	0.80
05/16/2023	C. Stephenson	B190/	Prepare for and attend conference call regarding strategy and organization of response briefing and research (1.8); conference call regarding specific case inquiries (.7).	2.50
05/16/2023	E. Weaver	B110/	Review business and marketing agreement (.2); TXSOS search and nationwide search for corporate records regarding GH Total Solutions (1.6).	1.80

Jones, Alex "AJ"

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May 31, 2023

Client # 50134

Invoice # 761710

Matter # 00802

Responsible Attorney
Vickie L. Driver

Post - petition

05/16/2023	E. Weaver	B190/	Electronic case file management of Elizabeth Freeman files.	4.20
05/16/2023	E. Weaver	B190/	Review bank account log for document production (.3); electronic case file management of filings for AEJ and FSS cases, along with additional documents received from outside counsel (2.7).	3.00
05/16/2023	R. Yates	B190/	Attend meeting to discuss dischargeability case and response to summary judgment motion	1.00
05/16/2023	R. Yates	B190/	Prepare for and attend litigation meeting to discuss response to summary judgment.	1.40
05/16/2023	J. Yoon	B190/	Conference regarding responses to motions for summary judgment of Connecticut and Texas tort-claimants for analysis and strategy.	0.70
05/16/2023	J. Yoon	B190/	Review extensive documents in preparation for production in response to UCC's Rule 2004 examination request.	6.40
05/17/2023	C. Blacklee	B190/	Finalized review of voice text, reviewed audio memos, show memos and notes from Alex Jones phone. Prepare same for searching and production	1.80
05/17/2023	C. Blacklee	B190/	Review and analyze voice notes and all text and memos from Alex Jones' cell phone (2.0); prepared report of same (.7).	2.70

Jones, Alex "AJ"

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May 31, 2023Client # 50134
Matter # 00802Invoice # 761710
Responsible Attorney
Vickie L. Driver

Post - petition

05/17/2023	C. Craig	B190/	Preparation and attendance of conference call with UCC regarding outstanding discovery issues; review and evaluate status of document production by debtor; develop strategy for addressing UCC's stated concerns on document production; review and analyze proposed documents to produce to UCC to evaluate privacy and privilege concerns. [NO CHARGE]	2.00
05/17/2023	L. Dauphin	B190/	Prepare supplemental document production.	0.10
05/17/2023	V. Driver	B110/	Approve stip for filing.	1.00
05/17/2023	V. Driver	B120/	Emails with literary agent on money owed under first book deal (.4); send emails to FAs for inclusion in financial statements (.2).	0.60
05/17/2023	V. Driver	B160/	Call with potential appellate counsel.	0.90
05/17/2023	V. Driver	B190/	Call with client on appeals (.3); research and analysis of appellate lawyers and status (.4); attend deposition (7.2); emails with counsel on appeals and deadlines for same. (.4)	8.30
05/17/2023	V. Driver	B195/	Travel to LA for deposition (billed at half time 4.6).	2.30
05/17/2023	V. Driver	B210/	Sending committee employment agreement for comments.	0.20

Jones, Alex "AJ"

Page 7
May 31, 2023Client # 50134
Matter # 00802Invoice # 761710
Responsible Attorney
Vickie L. Driver

Post - petition

05/17/2023	A. Finch	B110/	Meet with client re: UCC discovery requests (1.5); coordinate data collection with third-party vendor (Digital Mountain) (.8).	2.60
05/17/2023	A. Finch	B195/	Flight home from Austin, Texas. (meeting with client) (4.0 — billed at half time); drive to and from client's office (.6 — billed at half time)	2.30
05/17/2023	A. Finch	B210/	Review and analyze client's appearance on Louder with Crowder Ep. 2023 May 15 Monday (1.1); summarize statements made related to case (.1).	1.20
05/17/2023	D. McClellan	B190/	Review and analyze MSJ of Texas plaintiffs and authorities cited.	5.10
05/17/2023	D. McClellan	B190/	Develop strategy for MSJ response.	0.60
05/17/2023	C. Stephenson	B190/	Review and analyze discovery related correspondence (.8); review and respond to correspondence regarding appellate counsel (.5).	1.30
05/17/2023	C. Stephenson	B210/	Draft Motion to Approve Employment Agreement and related correspondence.	2.80
05/17/2023	C. Stephenson	B210/	Review new employment agreement and related correspondence.	1.20
05/17/2023	R. Yates	B190/	Write full rough draft of First Amendment argument	6.10

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05/17/2023	J. Yoon	B160/	Draft and revise First Interim Fee Application. [NO CHARGE]	1.30
05/17/2023	J. Yoon	B190/	Review and analyze extensive documents in preparation for production in response to UCC's Rule 2004 examination request.	5.30
05/18/2023	C. Craig	B190/	Preparation and attendance of conference call with UCC regarding outstanding discovery issues; review and evaluate status of document production by debtor; develop strategy for addressing UCC's stated concerns on document production; exchange correspondence with UCC regarding document production; prepare document production for UCC and draft email producing same to UCC. [NO CHARGE]	3.00
05/18/2023	L. Dauphin	B190/	Prepare Otterai transcripts for attorney production review.	2.00
05/18/2023	L. Dauphin	B190/	Modify production prepared 05/16/2023.	0.10
05/18/2023	V. Driver	B110/	Preparing for status conference.	2.10

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05/18/2023	V. Driver	B190/	Emails organizing discovery information (.4); review and respond to emails on phone information mining and third-party contract (.9); review email from committee on budget critique and respond briefly to same (.8); perform analysis regarding budget issues (1.5).	3.60
05/18/2023	V. Driver	B195/	Travel to Houston from LAX. (billed at half-time 5.2)	2.60
05/18/2023	V. Driver	B210/	Meeting with candidate (1.0); call with client on meeting (.3); correspondence regarding initial work (.3).	1.60
05/18/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 17 Wednesday (4.0); summarize statements made related to case (.2).	4.20
05/18/2023	D. McClellan	B190/	Review and analyze MSJ of Texas plaintiffs and authorities cited.	4.90
05/18/2023	D. McClellan	B190/	Develop strategy for MSJ response.	0.40
05/18/2023	C. Stephenson	B190/	Discovery conference call.	1.10
05/18/2023	C. Stephenson	B190/	Review UCC stipulation regarding exemption objections (.4); review and analyze discovery correspondence (.9); conference regarding discovery issues (1.1).	2.40

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05/18/2023	E. Weaver	B190/	Document review of previously produced documents in preparation of production in response to requests by UCC.	5.80
05/18/2023	R. Yates	B190/	Conduct legal research and coordinate issues and tasks regarding summary judgment in bankruptcy proceedings	2.30
05/18/2023	J. Yoon	B160/	Analyze and review previous monthly fee statements and pre-bill narratives in preparation to draft First Interim Fee Application (2.1); draft and revise interim fee application (1.2).	3.30
05/18/2023	J. Yoon	B190/	Analyze and review summary judgment evidence attached to Connecticut tort-claimants' motion for summary judgment in preparation for potential motion to strike.	2.70
05/19/2023	C. Craig	B190/	Review and analyze motions for summary judgment filed by adversary Plaintiffs; asses strategy in response to withheld exhibits	0.50
05/19/2023	C. Craig	B190/	Review and analyze 2004 requests issued by UCC to debtor (.4); review deadline. (.2)	0.60
05/19/2023	C. Craig	B190/	Attend court status hearing	1.10
05/19/2023	V. Driver	B110/	Preparation for and attend status conference.	1.80

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05/19/2023	V. Driver	B190/	Meetings with various parties seeking resolution on agreed upon bases including ESG, FSS. (1.6) Review emails on evidence to MSJ and videos not sent. (.2)	1.80
05/19/2023	V. Driver	B195/	Travel from Houston to Dallas (billed at half time 2.6)	1.30
05/19/2023	V. Driver	B210/	Calls and emails on budgeting issues and tapering domestic help expenses.	1.10
05/19/2023	A. Finch	B110/	Message Alex to facilitate discovery collection in response to 2004s	0.20
05/19/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 18 Thurs (4.0); summarize statements made related to case (.2)	4.20
05/19/2023	D. McClellan	B190/	Review and analyze MSJ of Texas plaintiffs and authorities cited	6.20
05/19/2023	C. Stephenson	B190/	Attend status conference hearing and draft related correspondence.	1.20
05/19/2023	C. Stephenson	B190/	Draft multiple correspondence and perform analysis regarding missing exhibits to MSJs (2.3); draft correspondence regarding evidentiary issues (1.1).	3.40
05/19/2023	C. Stephenson	B210/	Revisions to Motion to approve new employment contract and multiple related correspondence.	2.20

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05/19/2023	C. Stephenson	B320/	Draft correspondence regarding plan research.	1.20
05/19/2023	E. Weaver	B110/	Review stipulation and agreed order granting extension of time to object to claim exemptions and docket deadline for same.	0.20
05/19/2023	E. Weaver	B110/	Download and circulate to team amended notice of agreement on allocation of future website crypto donations prior to 05-19-2023 status conference.	0.20
05/19/2023	R. Yates	B190/	Coordinate discovery review and evidentiary issues	0.60
05/19/2023	R. Yates	B190/	Review and analyze motion for summary judgment	0.70
05/19/2023	J. Yoon	B160/	Analyze and review previous monthly fee statements and billing narratives to draft First Interim Fee Application (2.5); draft and revise same (2.8). [NO CHARGE]	5.30
05/19/2023	J. Yoon	B190/	Analyze and review summary judgment evidence in Connecticut and Texas tort-claimants' motions for summary judgment.	2.70
05/20/2023	V. Driver	B110/	Call with client reporting on status conference and meetings thereafter.	1.10
05/20/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 19 Friday (4.0); summarize statements made related to case (.1)	4.10

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05/20/2023	R. Yates	B190/	Conduct legal research on adverse inference in Connecticut	0.60
05/20/2023	R. Yates	B190/	Draft outline of "actually litigated" argument related to proportionality of discovery sanction	2.10
05/21/2023	D. McClellan	B190/	Review video exhibits of Texas plaintiffs' MSJ	1.90
05/21/2023	D. McClellan	B190/	Review exhibits to Texas plaintiffs' MSJ	4.10
05/22/2023	C. Craig	B190/	Draft correspondence to UCC regarding UCC's demand for filing of fraudulent transfer adversary proceedings	0.20
05/22/2023	C. Craig	B190/	Exchange communications with Digital Mountain regarding preservation of Debtor's icloud data; develop strategy for providing responsive information to the UCC	0.70
05/22/2023	V. Driver	B110/	Communication with client on work to control domestic help.	0.40
05/22/2023	V. Driver	B140/	Emails setting hearing on motion for relief from TX plaintiffs. (.2) Review and revise 9019 and send to counsel for TX plaintiffs. (.9)	1.10
05/22/2023	V. Driver	B160/	Review invoices for Martin firm.	0.30

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05/22/2023	V. Driver	B160/	Emails with counsel and financial advisors regarding first interim fee app filings coming up. (.2) Propose Interim Compensation fee app drafting sharing between counsel. (.3)	0.50
05/22/2023	V. Driver	B185/	Analyze issues with debtor executory contracts.	0.70
05/22/2023	V. Driver	B190/	Correspondence with production team on data gathering protocol, progress, and information needed to complete (.7); revise emails and respond to counsel 2004 responses and privilege preservation (.3);	1.00
05/22/2023	V. Driver	B190/	Review and revise Zensky letter responding to demand for lawsuit filing against third parties.	0.50
05/22/2023	V. Driver	B190/	Fontaine claim status emails (.4); review email from N. Pattis on brief filing extension and send to trial team (.2); review and revise engagement letter for additional trial counsel and send for review and approval (.5).	1.30
05/22/2023	V. Driver	B210/	Analyze issues with new post-petition potential agreements to increase income.	0.60

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05/22/2023	M. Figueroa	B190/	Began reviewing second batch of (2000 docs) previously produced documents while simultaneously redacting privileged information in anticipation of production in response to requests by UCC	1.30
05/22/2023	A. Finch	B110/	Communicate with client to facilitate discovery collection in response to 2004s (.3); email with Digital Mountain re: same (.1).	0.40
05/22/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 21 Sunday (2.0); summarize statements made related to case (.2)	2.20
05/22/2023	D. McClellan	B190/	Review state court trial transcripts for MSJ response	3.10
05/22/2023	D. McClellan	B190/	Review and analyze federal case law for MSJ response brief	6.80
05/22/2023	C. Stephenson	B120/	Perform research and analysis regarding administrative claim and related application.	1.20
05/22/2023	C. Stephenson	B160/	Call with estate professional regarding interim compensation and fee application matters.	0.80
05/22/2023	C. Stephenson	B185/	Review Objection of ESG to Motion to Reject Contracts (.8); draft related correspondence (.3).	1.10

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05/22/2023	C. Stephenson	B190/	Review and revise written correspondence to UCC (.8); draft related correspondence (.6).	1.40
05/22/2023	C. Stephenson	B190/	Review and analyze issues regarding rule questions (.9); draft correspondence regarding same (.8).	1.70
05/22/2023	E. Weaver	B110/	Review spreadsheet and supporting documents received from BlackBriar Advisors and prepare initial draft of April monthly operating report.	2.00
05/22/2023	R. Yates	B190/	Generate draft on IIED and collateral estoppel	2.50
05/22/2023	R. Yates	B190/	Generate draft on defamation and collateral estoppel (2.0); conduct legal research regarding the same (.4).	2.40
05/22/2023	R. Yates	B190/	Outline issues regarding the quality of the CUPTA punitive damages ruling	1.20
05/22/2023	J. Yoon	B190/	Draft and revise First Interim Fee Application. [NO CHARGE]	3.60
05/22/2023	J. Yoon	B190/	Analyze and review Connecticut case law regarding adverse inference from discovery violation to be incorporated into the response to Connecticut tort-claimants' motion for summary judgment.	1.60

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05/23/2023	C. Craig	B120/	Review and analyze terms of trust agreement to assess level of control debtor asserts over trust assets	0.70
05/23/2023	C. Craig	B190/	Develop strategy for responding to UCC 2004 requests for production (.9); evaluate status of obtaining responsive information (.6).	1.50
05/23/2023	C. Craig	B320/	Legal research in support of proposed chapter 11 plan	2.50
05/23/2023	V. Driver	B160/	Emails re Interim Fee App. (.1)	0.10
05/23/2023	V. Driver	B185/	Analyzing Response to Motion to reject contracts with ESG and MWM.	0.20
05/23/2023	V. Driver	B190/	Emails regarding information gathering for UCC requests. (.2) Emails with Pattis on CT deadlines and drafts of FSS/Jones brief (.2); send current draft to trial counsel (.1) Respond to email on Various Trust Information and UCC requests. (.2)	0.70
05/23/2023	V. Driver	B210/	Emails with literary agent on calculations of amounts paid under Great Reset (1st book) contract (.2); send Draft joint motion to approve new employment agreement and proposed order to FSS counsel. (.2)	0.40

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05/23/2023	M. Figueroa	B190/	Continued reviewing second batch (2000 docs) of previously produced documents for private property/family names while simultaneously redacting privileged information in anticipation of production in response to requests by UCC	1.10
05/23/2023	D. McClellan	B190/	Review and analyze Texas plaintiffs' MSJ exhibits	2.50
05/23/2023	D. McClellan	B190/	Review and analyze Texas plaintiffs' MSJ video exhibits	3.90
05/23/2023	C. McDonald	B190/	Perform Trust review.	0.20
05/23/2023	C. McDonald	B190/	Call regarding trust summary.	0.30
05/23/2023	C. Stephenson	B120/	Perform research and analysis regarding administrative claim and related application.	1.40
05/23/2023	C. Stephenson	B185/	Conference with Court on hearing setting (.2); conference with UCC on hearing setting (.2); call to ESG counsel on hearing setting (.1).	0.50
05/23/2023	E. Weaver	B110/	Revise, finalize and file monthly operating report and supporting documents for April, 2023.	3.20
05/23/2023	E. Weaver	B110/	Review UCC's request for production of documents related to the schedules and docket deadline for same.	0.20
05/23/2023	R. Yates	B190/	Conduct legal research on defamation per se	0.90

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05/23/2023	R. Yates	B190/	Analyze summary judgment brief to spot issues that need to be addressed in collateral estoppel section of response	1.50
05/23/2023	R. Yates	B190/	Edit draft of collateral estoppel argument	2.10
05/23/2023	R. Yates	B190/	Analyze jury charge in Connecticut	0.80
05/23/2023	R. Yates	B190/	Analyze CUPTA award for use in collateral estoppel section of brief	0.40
05/23/2023	J. Yoon	B160/	Draft and revise First Interim Fee Application (1.1); draft and revise proposed order granting the same (1.2). [NO CHARGE]	2.30
05/24/2023	C. Craig	B120/	Review and analyze Debtor's interest in trust assets in conjunction with assessing ability to obtain and produce trust documents to UCC	0.30
05/24/2023	C. Craig	B190/	Review and analyze pleadings from underlying state court actions in support of drafting response to adversary Plaintiffs' motions for summary judgment	0.80
05/24/2023	C. Craig	B190/	Review and analyze local rules on response briefing for motions for summary judgment.	0.20
05/24/2023	C. Craig	B190/	Develop strategy for production of responsive documents to UCC 2004 requests	0.40
05/24/2023	C. Craig	B320/	Conduct legal research in support of proposed chapter 11 plan	2.20

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05/24/2023	L. Dauphin	B190/	Digital Mountain - access and download email and phone collections; prepare same for discovery review.	1.50
05/24/2023	V. Driver	B160/	Analyze issues with Teneo fee statements (1.1); emails regarding calendaring objection deadlines (.3).	1.40
05/24/2023	M. Figueroa	B190/	Conference regarding document review.	0.10
05/24/2023	M. Figueroa	B190/	Continued reviewing second batch (2000 docs) of previously produced documents for attorney-client/confidential while simultaneously redacting privileged information in anticipation of production in response to requests by UCC	0.70
05/24/2023	M. Figueroa	B190/	Began reviewing third batch (2104 docs) of previously produced documents while simultaneously redacting private property information in anticipation of production in response to requests by UCC	0.60
05/24/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 22 Monday (4.0); summarize statements made related to case (.1)	4.10
05/24/2023	D. McClellan	B190/	Review and analyze Texas plaintiffs' MSJ video exhibits	5.30

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05/24/2023	D. McClellan	B190/	Review and analyze Texas law for Texas plaintiffs' MSJ response	2.50
05/24/2023	D. McClellan	B190/	Review and analyze Connecticut law for response to Connecticut plaintiffs' MSJ	1.10
05/24/2023	C. Stephenson	B120/	Conference and analysis regarding trust matters.	1.20
05/24/2023	C. Stephenson	B190/	Review and analyze discovery issues and related correspondence (.9); review and analyze correspondence regarding MSJ responses (.9).	1.80
05/24/2023	E. Weaver	B110/	Download and review twelfth interim order authorizing cash collateral in the FSS case and docket hearing regarding same.	0.20
05/24/2023	E. Weaver	B160/	Procure fee statements received from the UCC to date and circulate to team.	0.30
05/24/2023	E. Weaver	B160/	Review 1st-3rd fee statements filed by Teneo Capital, LLC and docket objection deadline for same.	0.30
05/24/2023	R. Yates	B190/	Draft defamation per se section on Connecticut response brief	1.70
05/24/2023	R. Yates	B190/	Edit collateral estoppel section of brief relating to actually litigated and necessarily decided standards	0.40
05/24/2023	R. Yates	B190/	Begin drafting argument against punitive damages establishing basis for collateral estoppel of 523(a)(6) issue	1.80

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05/24/2023	R. Yates	B190/	Continue to develop collateral estoppel arguments (1.8); edit draft regarding the same (.3).	2.10
05/24/2023	R. Yates	B190/	Draft section of brief on CUPTA award	1.80
05/24/2023	J. Yoon	B170/	Analyze and review Teneo's fee statements (0.2), order granting Teneo's employment as a retained professional and order setting interim compensation and reimbursement procedures (1.5); analyze and review BlackBriar's fees for comparable fee amounts to highlight potentially objectionable costs by Teneo (1.6); draft and revise response to Teneo's first three fee statements to reserve potential objections and highlight inefficient professional practices incurring costs (2.6).	4.10
05/25/2023	N. Collins	B240/	Receipt of AEJ 2018 Trust and commence analysis of same.	1.20
05/25/2023	C. Craig	B190/	Review and analyze underlying state court pleadings to assist with response to adversary Plaintiffs' motions for summary judgment [NO CHARGE]	1.20
05/25/2023	C. Craig	B190/	Review and analyze UCC's notice of 2004 requests to Toshi Holdings to assess impact on debtor	0.40

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05/25/2023	C. Craig	B190/	Develop strategy for producing information relating to trusts in which Debtor is a settlor, beneficiary or trustee	0.30
05/25/2023	C. Craig	B190/	Review scope of Debtor's use of technology devices to develop strategy in data collection effort in response to UCC requests for information	0.70
05/25/2023	C. Craig	B190/	Draft correspondence to the UCC regarding status of collection and review of phone and email correspondence.	1.50
05/25/2023	V. Driver	B120/	Emails re: filing Homestead exemption.	0.20
05/25/2023	V. Driver	B190/	Review 2004 exam to foreign entity (.2); research foreign entity existence and relationship to known entities (.9).	1.10
05/25/2023	V. Driver	B210/	Call with Executive assistant on household employee scheduling (.7); review handbook for household employees (.3). Call with FSS security head regarding meetings with sham client. (.7)	1.70
05/25/2023	M. Figueroa	B190/	Continued reviewing third batch (2104 docs) of previously produced documents while simultaneously redacting family names/privileged information in anticipation of production in response to requests by UCC	1.90

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05/25/2023	M. Figueroa	B190/	Began reviewing fourth (consolidated) batch (2787 docs) of previously produced documents while simultaneously redacting family names/private property/privileged information in anticipation of production in response to requests by UCC	1.40
05/25/2023	A. Finch	B110/	Review recovered data re: Client's Iphone/Digital Mountain collection (in responses to committee's 2004 requests)	1.60
05/25/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 23 Tuesday (4.0); summarize statements made related to case (.2)	4.20
05/25/2023	C. Stephenson	B190/	Draft correspondence regarding missing exhibits to MSJ.	0.80
05/25/2023	C. Stephenson	B190/	Review and respond to correspondence regarding discovery matters (1.1); analyze issues regarding 2004 exam (.7).	1.80
05/25/2023	C. Stephenson	B210/	Perform research and draft correspondence regarding ESG contract.	0.60

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05/25/2023	E. Weaver	B160/	Draft first interim fee application of Rachel Kennerly, as Tax Accountant (1.2); email correspondence to Rachel regarding time entries for 04-01-2023 - 05-15-2023 and circulate the order establishing interim compensation (.2).	1.40
05/25/2023	E. Weaver	B160/	Draft first interim fee application for BlackBriar Advisors, LLC.(1.2); email correspondence to Bob Schleizer regarding time entries 04-01-2023 - 05-15-2023 (.2).	1.40
05/25/2023	E. Weaver	B190/	Review and docket all dates and deadlines for 2004 examination/document requests received to date.	0.50
05/25/2023	R. Yates	B190/	Put together draft of main arguments (.8); compile list of needed evidence (.3).	1.10
05/25/2023	R. Yates	B190/	Edit First Amendment section of draft.	2.30
05/25/2023	R. Yates	B190/	Edit collateral estoppel argument section of brief	1.30
05/25/2023	J. Yoon	B170/	Analyze and review Teneo's fee statements and billing narratives to draft response and reservation of potential objections (4); draft and revise response to Teneo's first three fee statements (2.8).	3.20

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05/26/2023	C. Craig	B190/	Develop strategy for production of documents produced in underlying state court proceeding (.5); review and analyze documents to produce prior to production (1.0).	1.50
05/26/2023	M. Figueroa	B190/	Continued reviewing fourth (consolidated) batch (2787 docs) of previously produced documents while simultaneously redacting family names/private property/privileged information in anticipation of production in response to request by UCC	0.80
05/26/2023	A. Finch	B110/	Review recovered data re: Client's Iphone/Digital Mountain collection (in responses to committee's 2004 requests)	0.30
05/26/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 25 Thursday (4.0); summarize statements made related to case (.1)	4.10
05/26/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 24 Wednesday (4.0); summarize statements made related to case (.1)	4.10
05/26/2023	D. McClellan	B190/	Review and analyze Texas law for response to Texas plaintiffs' MSJ	1.20

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05/26/2023	C. Stephenson	B160/	Review and revise billing statements (4.2); review and revise fee applications (2.3)	6.50
05/26/2023	E. Weaver	B110/	Electronic case file management of monthly operating reports.	0.60
05/26/2023	R. Yates	B190/	Brainstorm topics for Connecticut collateral estoppel balancing test; communicate with co-counsel regarding the same	2.50
05/26/2023	R. Yates	B190/	Outline legal premises for section of brief questioning quality of prior proceedings	0.70
05/26/2023	J. Yoon	B170/	Analyze and review Teneo's fee statements and billing narratives for unnecessary fees for potential objections	3.10
05/27/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 26 Friday (4.0); summarize statements made related to case (.1)	4.10
05/29/2023	N. Collins	B240/	Continue analyzing Trust Agreement for tax treatment.	0.90
05/29/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 28 Sunday (2.0); summarize statements made related to case (.1)	2.10
05/29/2023	D. McClellan	B190/	Review and analyze draft response to Connecticut plaintiffs" MSJ	2.90

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05/29/2023	R. Yates	B190/	Research and draft section on skewing prior proceeding to pre-determine nondischargeability	1.40
05/29/2023	R. Yates	B190/	Draft legal premises for section of brief questioning quality of prior proceedings	2.20
05/29/2023	R. Yates	B190/	Draft section comparing willful and malicious section under 523(a)(6) to fraud exception under 523(a)(2)	0.80
05/29/2023	R. Yates	B190/	Draft outline of argument comparing extensiveness of prior proceedings here with that of prior proceedings in cases in which default judgments were given preclusive effect	0.60
05/30/2023	N. Collins	B240/	Evaluate Trust Agreement and asset protection features (2.0); discussion with Team regarding assets held by the Trust (.9).	2.90
05/30/2023	C. Craig	B120/	Review and analyze terms of trust agreement to assess level of control debtor asserts over trust assets	0.40
05/30/2023	C. Craig	B160/	Draft proposed order granting interim fee application of Rachel Kennerly, LLC	0.40
05/30/2023	C. Craig	B160/	Draft proposed order granting interim fee application of Blackbriar Advisors	0.40
05/30/2023	C. Craig	B160/	Draft proposed order granting interim fee application of Crowe & Dunlevy	0.40

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Responsible Attorney
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05/30/2023	C. Craig	B190/	Review and analyze correspondence from the UCC regarding status of document production in this matter.	0.60
05/30/2023	C. Craig	B190/	Review document production by Bank of America, NA for potential confidential information shared with entities not a party to the Protective Order (.3); draft correspondence to entities regarding Protective Order in place (.3).	0.60
05/30/2023	C. Craig	B190/	Prepare production of responsive documents to UCC requests.	1.00
05/30/2023	V. Driver	B140/	Emails with A. Reynal on fee estimates for lift stay motion hearing if needed.	0.10
05/30/2023	V. Driver	B190/	Call discussing production by 2004 respondent to overly broad distribution list and formulate strategy to seek agreement from recipients to agree to PO if they access the link provided (.6); review emails regarding same (.3); Begin drafting contract with FSS on product and marketing services with Debtor (1.1).	2.00
05/30/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 29 Monday (4.0); summarize statements made related to case (.1)	4.10

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05/30/2023	D. McClellan	B190/	Develop strategy for response to Texas plaintiffs' MSJ	0.70
05/30/2023	D. McClellan	B190/	Review and analyze state court record for response to Texas plaintiffs' MSJ	1.50
05/30/2023	D. McClellan	B190/	Draft analysis section of response to Texas plaintiffs' MSJ	7.30
05/30/2023	C. Stephenson	B120/	Conference regarding Trust matters (.8); review and respond to related correspondence (.5).	1.30
05/30/2023	C. Stephenson	B160/	Call regarding fee app status for other professional (.3); review related correspondence (.6); revise C&D fee application and revise billing (3.8); review and revise BlackBriar fee application (.9); review and revise Kennerly fee application (.6); review and revise proposed orders (1.3).	7.50
05/30/2023	C. Stephenson	B190/	Conference and correspondence regarding discovery issues.	0.40
05/30/2023	E. Weaver	B160/	Revise, finalize and file first interim fee applications for Crowe & Dunlevy, BlackBriar Advisors and Rachel Kennerly (4.2); compile fee applications and serve via email according to interim compensation order (.5).	4.70
05/30/2023	R. Yates	B190/	Develop arguments for brief with Deric J. McClellan	0.90

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05/30/2023	R. Yates	B190/	Strengthen First Amendment argument with examples and citations	0.90
05/30/2023	R. Yates	B190/	Draft "actually litigated" section of response brief	2.70
05/30/2023	R. Yates	B190/	Coordinate for review of record evidence to support factual assertions in brief	0.30
05/30/2023	R. Yates	B190/	Review sections on improper skew of prior legal proceedings and actually litigated prong of collateral estoppel	0.40
05/30/2023	R. Yates	B190/	Outline full argument section of brief	0.50
05/30/2023	J. Yoon	B190/	Analyze and review Connecticut state court case record for evidentiary support for response to motion for summary judgment and incorporate into response to motion for summary judgment of the Connecticut tort claimants.	5.30
05/31/2023	C. Craig	B190/	Assess status of icloud and email data collection (.3); develop strategy for review process of such data collection in response to UCC requests (.4).	0.70
05/31/2023	V. Driver	B140/	Call with TX Tort Claimant counsel on status of comments to 9019	0.50

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Vickie L. Driver

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05/31/2023	V. Driver	B190/	Send update on Fontaine procedural status to dischargeability trial team (.1); send brief from Pattis to trial team for comments (.2); call with SubV Trustee on mediation counter proposal (.4); review data production and retrieval contents and review protocol for same (.8)	1.50
05/31/2023	V. Driver	B210/	Emails scheduling call on employment agreement comments with SubV trustee counsel, FSS and UCC (.2); emails discussing interplay of issues regarding employment agreement and overall settlement discussions and budget disagreements (.7); review comments from FSS counsel on motion to approve employment agreement (.2); review plan projections and send comments (.5); review responses to same (.1); drafting Product and Marketing services agreement between AJ and FSS and send for comment (1.2)	2.90
05/31/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 30 Tuesday (4.0); summarize statements made related to case (.1)	4.10
05/31/2023	D. McClellan	B190/	Draft analysis section of response to Texas plaintiffs' MSJ	8.50

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05/31/2023	E. Weaver	B110/	Electronic case file management.	2.80
05/31/2023	R. Yates	B190/	Draft section of brief in response to summary judgment motion regarding public policy balancing against collateral estoppel	4.90
05/31/2023	J. Yoon	B170/	Analyze and review Teneo's fee statements and billing narratives for potentially objectionable fees to be incorporated into response to Teneo's first three fee statements.	3.10
05/31/2023	J. Yoon	B190/	Analyze and review Connecticut state court case record for evidentiary support for response to motion for summary judgment and incorporate into response to motion for summary judgment of the Connecticut tort claimants.	3.70
Total Hours				454.50
Total Fees for this Invoice				\$181,217.00

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	29.60	12,493.00	Bankruptcy - Case Administration
B120	8.70	5,801.50	Bankruptcy - Asset Analysis and Recovery

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Vickie L. Driver

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SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B140	1.70	1,351.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B160	40.10	16,340.50	Bankruptcy - Fee/Employment Applications
B170	13.50	3,847.50	Bankruptcy - Fee/Employment Objections
B185	2.50	1,859.50	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	269.50	100,146.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	11.80	6,637.00	Bankruptcy - Non-Working Travel
B210	66.20	27,144.00	Bankruptcy - Business Operations
B240	5.00	3,375.00	Bankruptcy - Tax Issues
B320	5.90	2,221.00	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	454.50	\$181,217.00	

05/18/2023 VENDOR: Finch , Amanda; INVOICE#: 760911; DATE: 5/18/2023 \$1,067.91
 - AMF; reimbursement for travel expenses to/from Austin, Texas, May 16-17, 2023 for work on the bankruptcy case; transportation \$677.57; lodging \$157.95; meals \$161.02; mileage 54 x .655/mile \$35.37; parking \$36.00

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Vickie L. Driver

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05/22/2023	VENDOR: Driver , Vickie; INVOICE#: 760947; DATE: 5/22/2023 - Driver, Vickie - Reimbursement for travel to Austin, Texas 4/25/2023 - 4/26/2023 for Dischargeability Analysis of both Texas and Connecticut complaint	684.84
05/22/2023	VENDOR: Driver , Vickie; INVOICE#: 760952; DATE: 5/22/2023 - Driver, Vickie L. - Reimbursement for travel to Austin, Texas 5/3/2023-5/5/2023 to analyze issues with ESG and FSS and analyze potential resolution	1,168.01
05/24/2023	Staine, Christopher reimbursement for record retrieval fees 5/8/2023	24.90
05/24/2023	Staine, Christopher reimbursement for payment of documents from Texas Research 4/6/2023	6.15
05/24/2023	Staine, Christopher reimbursement for payment of fees associated with document purchase from Texas Research 4/24/2023	36.85
05/25/2023	Davis Chris reimbursement for dinner with Vickie Driver and Deric McClellan to discuss Alex Jones case 3/22/2023	370.87
05/31/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of May 2023	832.00
	Subtotal of Expenses	<hr/> \$4,191.53
	Online Research	\$453.60
	Subtotal of Costs	<hr/> \$453.60
	Total Expenses and Costs for this Invoice	<hr/> \$4,645.13

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Vickie L. Driver

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SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E106	453.60	On-line research
E110	2,920.76	Out-of-town travel
E111	370.87	Meals
E118	832.00	Litigation support vendors
E123	67.90	Other professionals
Total	<u>\$4,645.13</u>	

Total For This Invoice

\$185,862.13

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Responsible Attorney
Vickie L. Driver

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SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
C. Blacklee	6.10	225.00	1,372.50
L. Dauphin	3.70	185.00	684.50
D. McClellan	76.60	310.00	23,746.00
V. Driver	57.00	795.00	45,315.00
C. Stephenson	49.30	715.00	35,249.50
J. Booth	0.10	265.00	26.50
E. Weaver	32.80	295.00	9,676.00
A. Finch	67.60	305.00	20,618.00
C. McDonald	0.50	255.00	127.50
M. Figueroa	7.90	250.00	1,975.00
R. Yates	57.90	340.00	19,686.00
N. Collins	5.00	675.00	3,375.00
C. Craig	32.30	229.85	7,424.00
J. Yoon	57.70	206.96	11,941.50
Total	454.50		\$181,217.00

EXHIBIT “B”

Sixth Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SIXTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JUNE 1, 2023 THROUGH JUNE 30, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	06/01/2023	06/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$273,113.60 ¹ (80% of \$341,392.00)
Total Reimbursable Expenses Requested in this Statement:		\$529.51 ²
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:		\$327,350.00
Total Actual Attorneys Hours Covered by this Statement:		740.5
Average Hourly Rate for Attorneys:		\$456.26
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:		\$14,042.00
Total Actual Paraprofessional Hours Covered by this Statement:		56.9
Average Hourly Rate for Paraprofessionals:		\$246.78

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Sixth Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from June 1, 2023 through June 30, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$273,113.60 (80% of 341,392.00) as compensation for professional services rendered to the Debtor during the period from June 1, 2023 through June 30, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$529.51, for a total amount of \$273,643.11 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$341,392.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$529.51 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$273,643.11 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX
Dated: August 31, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 737.218.6187
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on August 31, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	529.51
Litigation support vendors	0.00

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	4.4	4.3
B120 Asset Analysis and Recovery	11.2	1.2
B130 Asset Disposition	1.0	0.0
B140 Relief from Stay/Adequate Protection	20.4	.2
B150 Meetings of & Communications with Creditors	0.00	0.0
B160 Fee/Employment Applications	21.3	5.3
B170 Fee/Employment Objections	27.1	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	4.7	.2
B190 Other Contested Matters	519.10	41.9
B195 Non-Working Travel	6.8	0.00
B210 Business Operations	108.4	2.2
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.00
B240 Tax Issues	5.8	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	8.0	1.6
B320 Plan and Disclosure Statement	2.3	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	740.5	56.9

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

June 30, 2023
Invoice # 761699

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$341,392.00
Current Invoice Total Expenses	<u>\$529.51</u>
Current Invoice Total	<u>\$341,921.51</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 761699 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

Post - petition

06/01/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests for production by UCC.	2.00
06/01/2023	C. Craig	B190/	Review and analyze drafted declaration from Digital Mountain regarding data collection (.3); draft correspondence to Digital Mountain with questions regarding same (.3).	0.60
06/01/2023	L. Dauphin	B190/	Configure search term reports.	2.50
06/01/2023	J. Davis	B190/	Review and analyze response to MSJ regarding the Connecticut Plaintiffs non-dischargeability claim.	2.50
06/01/2023	V. Driver	B160/	Correspondence with Committee on outstanding fees owed to Debtor professionals.	0.30
06/01/2023	V. Driver	B190/	Review and comment to review protocol for data collection (.4); draft outline of counter proposal to UCC settlement offer and send to internal team for review and comment (1.3).	1.70

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

Post - petition

06/01/2023	V. Driver	B210/	Call with FSS regarding employment agreement matters (.3); call with UCC FSS and SubV Trustee discussing employment agreement comments (.5); call with FSS regarding terms of interim comp increase compromise with UCC (.6); mark up provisions of employment agreement for interim approval and send to FSS for review and approval (.5); call with financial advisor to discuss employment compromise, upcoming meetings with client on operational issues and related issues (.8).	2.70
06/01/2023	D. McClellan	B190/	Review case law cited by Texas plaintiffs in motion for summary judgment.	1.20
06/01/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	0.70
06/01/2023	D. McClellan	B190/	Review and analyze trial transcripts for response to Texas plaintiffs' motion for summary judgment.	7.40
06/01/2023	D. McClellan	B190/	Develop strategy for response to Texas and Connecticut plaintiffs' motions for summary judgment.	0.50
06/01/2023	R. Yates	B190/	Analyze standard for comprehensive of record in determining First Amendment standard in bankruptcy court, as opposed to appellate court.	0.30

Jones, Alex "AJ"

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

Post - petition

06/01/2023	R. Yates	B190/	Edit and circulate draft response brief.	1.10
06/01/2023	R. Yates	B190/	Draft summary of legal issues with the CUPTA award.	2.10
06/01/2023	R. Yates	B190/	Edit substantive due process section of brief.	1.30
06/01/2023	J. Yoon	B170/	Analyze and review Teneo's first, second, and third fee statements for objectionable fees due to overstaffing, and unnecessary financial analysis (4.2); draft and revise response to UCC reserving right to object and analysis of objectionable basis (3.3). [NO CHARGE]	7.50
06/02/2023	C. Craig	B190/	Exchange multiple emails with UCC regarding UCC's requests for production to Debtor.	0.40
06/02/2023	C. Craig	B190/	Develop strategy for document production in response to UCC's requests for production to Debtor. [NO CHARGE]	1.00
06/02/2023	C. Craig	B190/	Review and analyze extensive documents in response to UCC's requests for production to Debtor.	1.50
06/02/2023	C. Craig	B190/	Draft correspondence to UCC regarding email and phone production efforts.	0.50

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06/02/2023	L. Dauphin	B110/	Identify issues reported by Committee related to 05/30/23 document production (.3); edit configuration and modify production to include audio and video inadvertently omitted. (1.0)	1.30
06/02/2023	L. Dauphin	B190/	Continue to prepare search term reports.	2.30
06/02/2023	V. Driver	B110/	Correspondence with individual who claims to have avenues for claim resolution and seek additional information on same.	0.30
06/02/2023	V. Driver	B190/	Emails with mediator regarding settlement discussions.	0.60
06/02/2023	A. Finch	B110/	Review correspondence with UCC re: document production re: 2004 requests.	0.20
06/02/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 30 Wednesday (4.0); summarize statements made related to case (.1).	4.10
06/02/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	5.90
06/02/2023	R. Yates	B190/	Edit brief to respond to various arguments raised in summary judgment motion.	1.30
06/02/2023	R. Yates	B190/	Draft response to cases cited in summary judgment motion.	1.00

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06/02/2023	R. Yates	B190/	Make list of topics discussed in summary judgment motion that have yet to be addressed in response.	1.10
06/02/2023	J. Yoon	B170/	Analyze and review Teneo's first, second, and third fee statements for objectionable fees due to overstaffing, and unnecessary financial analysis (1.2); draft and revise response to UCC reserving right to object and analysis of objectionable basis (2.3). [NO CHARGE]	3.50
06/03/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 1 Thursday (4.0); summarize statements made related to case (.2).	4.20
06/03/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	7.80
06/04/2023	V. Driver	B190/	Emails with briefing team for CT and TX regarding affidavit and supporting evidence needed and timing.	0.40
06/04/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 2 Friday (4.0); summarize statements made related to case (.4).	4.40
06/04/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	6.30

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06/05/2023	C. Craig	B190/	Develop strategy for drafting responses to plaintiffs' motions for summary judgment. [NO CHARGE]	1.00
06/05/2023	C. Craig	B190/	Review and analyze underlying state court action pleadings in support of drafting responses to Plaintiffs' motions for summary judgment. [NO CHARGE]	2.00
06/05/2023	C. Craig	B190/	Review and analyze UCC correspondence regarding document production by Debtor.	0.20
06/05/2023	V. Driver	B140/	Review and revise 9019 motion and send to counsel for TX (.8); review and revise order and send comments to TX and FSS counsel (.4); discuss 9019 with counsel for FSS (.4).	1.60
06/05/2023	V. Driver	B160/	Call with B. Schleizer regarding support for Teneo fee statement objection (.4); emails regarding supporting schedules for email (.2).	0.60
06/05/2023	V. Driver	B160/	Emails with A. Reynal regarding sanctions.	0.20
06/05/2023	V. Driver	B190/	Correspondence regarding questions on documents and production (2); call with team to discuss briefing, strategy, and staffing outstanding items (1.2); correspondence with UCC on discovery, document review and production. (.2)	1.60

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06/05/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 4 Sunday (2.0); summarize statements made related to case (.2)	2.20
06/05/2023	D. McClellan	B190/	Develop strategy regarding responses to Texas and Connecticut plaintiffs' motions for summary judgment	0.60
06/05/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment	11.80
06/05/2023	C. Stephenson	B190/	Draft summary correspondence regarding settlement analysis and terms.	1.20
06/05/2023	R. Yates	B190/	Coordinate writing responsibilities and develop strategies with Deric J. McClellan	0.90
06/05/2023	R. Yates	B190/	Review legal research (.8); create list of items to add to the brief (.3).	1.10
06/05/2023	R. Yates	B190/	Attend litigation team meeting to discuss brief draft and division of labor	0.70
06/05/2023	R. Yates	B190/	Edit response brief to incorporate revisions	1.60
06/05/2023	R. Yates	B190/	Review and analyze Plaintiff's statement of undisputed material facts for response	1.10

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06/05/2023	J. Yoon	B170/	Analyze and review Teneo's first, second, and third fee statements for objectionable fees due to overstaffing, and unnecessary financial analysis (3.1); draft and revise analysis of objectionable basis in preparation for email to UCC reserving objections (2.2). [NO CHARGE]	5.30
06/05/2023	J. Yoon	B190/	Analyze and strategize summary judgment responses and objections to both Connecticut and Texas tort claimants' statement of facts and summary judgment evidence.	0.70
06/05/2023	J. Yoon	B190/	Analyze and review Connecticut state court trial transcripts in preparation to draft fact section of the Connecticut response to summary judgment - specifically focusing on instances in which the debtor was prevented from presenting evidence.	1.70
06/06/2023	C. Craig	B190/	Exchange multiple emails with UCC regarding UCC's requests for production to Debtor.	0.40
06/06/2023	C. Craig	B190/	Review and analyze Motion for Protection filed by ESG.	0.50
06/06/2023	C. Craig	B190/	Review and analyze extensive client documents in response to document requests by UCC.	3.00

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06/06/2023	V. Driver	B170/	Request extension of deadline to reserve fees for payment under interim compensation order (.1); work with B. Schleizer to prepare email reserving certain objectionable fees for payment until fee application per item compensation order. (2.1)	2.20
06/06/2023	V. Driver	B185/	Emails with counsel for UCC on use of 408 discussion email as exhibit.	0.30
06/06/2023	V. Driver	B190/	Emails with document review team on specific document issues (.2); emails on home improvement/repair invoices. (1)	0.30
06/06/2023	V. Driver	B210/	Review and send revised FSS forecast to B. Schelizer and discuss (.1); review and analyze the offer from UCC on employment contract. (.4)	0.50
06/06/2023	V. Driver	B240/	Review POC filed by IRS for payroll taxes and analyze same (.5); send to FSS for review (.2); send to tax accountant for research on same (.2).	0.90
06/06/2023	M. Figueroa	B190/	Review and evaluate extensive client documents in response to UCC's 2004 requests for production.	0.50

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06/06/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 5 Monday (4.0); summarize statements made related to case (.1).	4.10
06/06/2023	D. McClellan	B190/	Develop strategy regarding responses to Texas and Connecticut plaintiffs' motions for summary judgment.	0.70
06/06/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	9.60
06/06/2023	E. Weaver	B160/	Download and review first, second and third monthly fee statements filed by Teneo Capital, circulate to team and docket objection deadline for same.	0.30
06/06/2023	E. Weaver	B185/	Review agreed order to extend time to assume commercial real property lease with BCC UBC, LLC and docket extended date to assume or reject.	0.20
06/06/2023	E. Weaver	B190/	Telephone call with Kathy Nordenhaug regarding Contini invoices.	0.10
06/06/2023	E. Weaver	B190/	Review emergency motion for protection by Elevated Solutions Group, LLC and docket objection deadline for same.	0.20

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06/06/2023	E. Weaver	B190/	Email correspondence to and from CRD to confirm page limit requirement for response/reply to MSJ.	0.20
06/06/2023	E. Weaver	B190/	Search for unredacted version of UCC's 2004 requests.	0.20
06/06/2023	E. Weaver	B310/	Download and review amended IRS claim and circulate to team.	0.30
06/06/2023	R. Yates	B190/	Draft responses to individual statements of material facts 1-58 (2.0); review record regarding the same (2.0); coordinate research regarding the same (.9).	4.90
06/06/2023	J. Yoon	B170/	Analyze and review Teneo's first, second, and third fee statements for objectionable fees due to overstaffing, and unnecessary financial analysis (0.4); draft and revise analysis and calculation of objectionable fee amounts and basis (1).	1.40
06/06/2023	J. Yoon	B190/	Analyze and review Connecticut state court trial transcripts in preparation to draft fact section of the Connecticut response to summary judgment - specifically focusing on instances in which the debtor was prevented from presenting evidence and when default principles were used to establish malicious intent.	5.70

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06/07/2023	C. Craig	B190/	Review and analyze underlying state court action pleadings in support of drafting responses to Plaintiffs' motions for summary judgment. [NO CHARGE]	3.00
06/07/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	2.00
06/07/2023	V. Driver	B130/	Review and respond to emails from personal attorney on issues related to ownership of property.	0.30
06/07/2023	V. Driver	B140/	Preparing 9019 for filing (.4); review and revise motion to seal and order granting same (.6).	1.00
06/07/2023	V. Driver	B185/	Continue emails on exhibits to motion to reject hearing with UCC counsel.	0.30

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06/07/2023	V. Driver	B190/	Review and revise settlement offer per internal comments and circulate to team for review and further comment (1.1); sending motion to seal and order to FSS counsel for review and approval for filing in FSS case (.2); review and revise affidavit in support of MSJ responses (.9); emails with litigation team to discuss revisions (.3); call to discuss affidavit contents and brief status (.7); reviewing clips referenced by plaintiffs MSJs (.7); emails with B. Schleizer on affidavit changes and open issues to discuss with client (.5).	4.40
06/07/2023	M. Figueroa	B190/	Review and evaluate extensive client documents in response to UCC's 2004 requests for production.	0.60
06/07/2023	A. Finch	B190/	Review documents for production to UCC (in response to 2004 requests).	0.30
06/07/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 6 Tuesday (4.0); summarize statements made related to case (.3).	4.30
06/07/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	7.50
06/07/2023	D. McClellan	B190/	Draft affidavit in support of motion for summary judgment.	2.60

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06/07/2023	C. Stephenson	B185/	Review and analyze UCC Objection to ESG Emergency Motion.	1.20
06/07/2023	C. Stephenson	B190/	Review and revise settlement proposal (1.1); draft related correspondence (.3).	1.40
06/07/2023	C. Stephenson	B190/	Review and revise declaration in support of MSJ response (1.3); review and respond to related correspondence (.8); perform analysis regarding same (.8).	2.90
06/07/2023	E. Weaver	B190/	Revise and finalize motion for approval of compromise and settlement under FRP 9019, along with proposed agreed order (.6); draft motion to seal exhibit A to agreed order and corresponding proposed order to same (1.4).	2.00
06/07/2023	R. Yates	B190/	Cite check and edit brief.	1.80
06/07/2023	R. Yates	B190/	Edit brief.	1.60
06/07/2023	R. Yates	B190/	Review and analyze brief (1.6); create list of additions and edits. (.3)	1.80
06/07/2023	R. Yates	B190/	Continue to draft response to statement of undisputed material facts (2.6); review record regarding the same. (1.3)	3.60
06/07/2023	J. Yoon	B190/	Draft and revise the response to Connecticut tort claimants' motion for summary judgment.	2.30

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06/07/2023	J. Yoon	B190/	Analyze, review, and revise the debtor's declaration in support of his response to summary judgment motions.	0.50
06/08/2023	C. Craig	B190/	Review and analyze extensive client documents in response to UCC requests.	5.50
06/08/2023	L. Dauphin	B190/	Apply redactions to billing narratives in preparation of production.	2.40
06/08/2023	V. Driver	B140/	Begin drafting ESG demand letter regarding assertion of owning Platinum inventory.	0.20
06/08/2023	V. Driver	B190/	Emails with team analyzing cases and discussing strategy for MSJ responses (.9); review cases on MSJ regarding non-dischargeability and collateral estoppel issues (.8); calls with client reviewing affidavit (.9); emails with trial team on affidavit changes and edits (1.1).	3.70
06/08/2023	V. Driver	B210/	Emails seeking update on deposition sought with UCC to ESG motion to quash (.1); attend hearing on motion to quash (1.1); discuss results of hearing with client and team (.6).	1.80
06/08/2023	M. Figueroa	B190/	Review and evaluate extensive client documents in response to UCC's 2004 requests for production.	2.30

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06/08/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 7 Wednesday (4.0); summarize statements made related to case (.1).	4.10
06/08/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	13.90
06/08/2023	C. Stephenson	B190/	Calls and correspondence regarding client declaration (3.8); analyze statement of undisputed material facts and objections to same (2.8); draft analysis and general comments regarding briefing (1.8); review draft CT response (2.2).	10.60
06/08/2023	E. Weaver	B120/	Review objection to debtor's motion to reject executory contract and Professional Services Agreement with Elevated Solutions Group, LLC (.4); draft demand letter to counsel for ESG regarding provisions of the agreement (.8).	1.20
06/08/2023	R. Yates	B190/	Edit brief (5.0); conduct legal research (1.0); discuss remaining legal and factual issues (1.0); restructure arguments in accordance with team meetings (1.0); advise on other briefing (1.9).	9.90

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06/08/2023	J. Yoon	B190/	Draft and revise the fact section of the response to Connecticut tort claimants' motion for summary judgment (1.7); analyze and review Connecticut state court record for in preparation to draft fact section of the brief and the affidavit (2.4).	4.10
06/08/2023	J. Yoon	B190/	Analyze and review Connecticut and Texas tort claimants' summary judgment evidence and statements of facts in preparation to incorporate facts into the debtor's declaration not already submitted as summary judgment evidence.	2.30
06/09/2023	L. Dauphin	B190/	Continue to apply redactions and prepare client document production for attorney review and approval.	1.90
06/09/2023	J. Davis	B190/	Review and analyze Texas MSJ Response.	3.50
06/09/2023	J. Davis	B190/	Review and analyze Connecticut MSJ Response.	4.00

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06/09/2023	V. Driver	B190/	<p>Begin review of TX MSJ response and initial comments to initial draft (2.8); analyze need for objection to statement of undisputed facts and contents of same (1.7); discuss strategy for first amendment argument revision (.7); discuss relevant issues with team (1.1); review offer support and revisions to same with financial advisors (.8); email with mediator regarding timing on settlement offer (.2); analyze additional comments to draft offer (.3); finalize offer and send to mediator and SubV trustee (.4); review issues with production and discuss same with team (.8); emails regarding scheduling depositions and topics for 2004 with Debtor and B. Schliezer (.8); call with trial team on 2004 issues (.3); emails with parties to 9019 and committee confirming no objection to sharing unredacted Exhibit A to 9019. (1.5)</p>	11.40
06/09/2023	V. Driver	B210/	<p>Call with S. Brauner to discuss interim compensation increase terms (.4); emails with accounting regarding setting up escrow and report same to UCC (.2); review email regarding moving domain registry and send to B. Schleizer for review. (.3)</p>	0.90

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06/09/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment	14.90
06/09/2023	T. Smith	B190/	Review documents being produced for discovery for necessary redactions	2.50
06/09/2023	C. Stephenson	B190/	Review and revise Responses and Objections to Plaintiffs' Motion for Summary Judgment (6.3); review and revise settlement offer (.5); review and respond to various discovery correspondence (1.3).	8.10
06/09/2023	E. Weaver	B190/	Serve via email unredacted Exhibit A to agreed 9019 order to Sara Brauner, Jennifer Hardy, Avi Mosenberg and Jarrod Martin.	0.10
06/09/2023	R. Yates	B190/	Incorporate suggestions to changes in the draft from the litigation and bankruptcy teams	0.90
06/09/2023	R. Yates	B190/	Coordinate exhibits to attach to response brief.	0.50
06/09/2023	R. Yates	B190/	Coordinate objection to evidentiary material.	0.20
06/09/2023	R. Yates	B190/	Format legal citations in brief.	1.20
06/09/2023	R. Yates	B190/	Discuss final issues to address in brief in response to summary judgment with co-counsel	0.60
06/09/2023	R. Yates	B190/	Edit, cite check, modify brief.	1.90

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06/09/2023	J. Yoon	B190/	Analyze summary judgment motion and evidence of both Texas and Connecticut tort claimants to strategize motion to strike/objection to summary judgment evidence.	0.20
06/09/2023	J. Yoon	B190/	Analyze and review document production batch for redaction and responsiveness to UCC's Rule 2004 examination document requests (3.1); draft email to UCC's counsel regarding potential privacy issue and delay due to same (0.5).	3.60
06/09/2023	J. Yoon	B190/	Draft and revise Objection and Response to Plaintiffs' Statement of Undisputed Material Facts against Connecticut and Texas summary judgment motions (1.6); analyze and review the tort claimants' statements of undisputed material facts in preparation to draft objections (2.5).	4.10
06/10/2023	V. Driver	B190/	Review and revise TX brief (4.1); call with team to discuss structural changes needed for final versions (.8).	4.90
06/10/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 8 Thursday (4.0); summarize statements made related to case (.1).	4.10

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06/10/2023	D. McClellan	B190/	Draft and revise response to Texas plaintiffs' motion for summary judgment.	12.50
06/10/2023	C. Stephenson	B190/	Review and revise Response and Objection to CT MSJ (6.4); calls and correspondence regarding same (1.3).	8.10
06/10/2023	R. Yates	B190/	Edit drafts to brief (3.5); review drafts (1.0); attend team meetings (1.4).	5.90
06/10/2023	J. Yoon	B190/	Draft Statements of Undisputed Material Facts for the debtor's response to Texas tort claimants' summary judgment motion (2.7); draft Objection and Response to Texas tort claimants' Statement of Undisputed Material Facts (4.1); draft Statements of Undisputed Material Facts for the debtor's response to Connecticut tort claimants' summary judgment motion (2.4); draft Objection and Response to Connecticut tort claimants' Statement of Undisputed Material Facts (3.9).	13.10
06/10/2023	J. Yoon	B190/	Analyze, review, and strategize briefing strategy to ensure no assignments overlap between members and all parts of the briefs are assigned to drafters.	0.80

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06/11/2023	V. Driver	B190/	Review and revise CT brief and send email to team with comments and questions (3.6); review and revise TX brief and send comments to team (3.1).	6.70
06/11/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 9 Friday (4.0); summarize statements made related to case (.1).	4.10
06/11/2023	D. McClellan	B190/	Draft and revise response to Texas plaintiffs' motion for summary judgment.	10.60
06/11/2023	C. Stephenson	B190/	Review and revise Draft Responses and Objections to TX and CT MSJs (9.8); review and respond to related correspondence (2.8).	12.60
06/11/2023	R. Yates	B190/	Draft, revise, edit, comment on several drafts of briefs, statements, and points of law for final response to summary judgment.	6.60
06/11/2023	J. Yoon	B190/	Draft and revise response to Texas tort claimants' summary judgment motion and fix all citations to conform to Bluebook and Greenbook (6.6); revise the debtor's declaration in support of the same (0.7).	7.30

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06/12/2023	N. Collins	B240/	Analyze tax treatment of a potential settlement and associated legal fees (2.9); call with outside advisors regarding hypothetical settlement structure (.9); commence drafting memorandum with IRS authority regarding same (.9).	4.70
06/12/2023	L. Dauphin	B190/	Continue to apply redactions to billing narratives in preparation of production.	0.50
06/12/2023	J. Davis	B190/	Work on final review of brief in opposition to Texas plaintiffs MSJ on dischargeability (2.5); work helping to organize exhibits (1.5).	4.00
06/12/2023	J. Davis	B190/	Work on final review of brief in opposition to Connecticut plaintiffs MSJ on dischargeability (2.5); work helping to organize exhibits (1.5).	4.00
06/12/2023	V. Driver	B190/	Review and revise TX brief (3.4); call with briefing team on brief revision status and analyzing last minute structural changes (1.1); review and revise objections to evidence and SUMF (2.1); draft conclusion (1.2); review and revise conclusion (.8); correspondence regarding Debtor deposition parameters and dates (.3).	8.90
06/12/2023	V. Driver	B240/	Emails regarding Guadalupe County appraisal notice.	0.20

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06/12/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 11 Sunday (2.0); summarize statements made related to case (.2).	2.20
06/12/2023	A. Finch	B210/	Review and analyze client's guest appearance on Louder with Crowder on June 7 (1.1); summarize statements made related to case (.1).	1.20
06/12/2023	A. Finch	B210/	Review and analyze client's guest appearance on Louder with Crowder on June 6 (1.2); summarize statements made related to case (.1).	1.30
06/12/2023	D. McClellan	B190/	Revise responses to Texas and Connecticut plaintiffs' motions for summary judgment.	9.30
06/12/2023	D. McClellan	B190/	Revise affidavit filed in support of response to Texas and Connecticut plaintiffs' motions for summary judgment.	1.50
06/12/2023	D. McClellan	B190/	Revise responses to Texas and Connecticut plaintiffs' statement of uncontested material facts.	2.50
06/12/2023	D. McClellan	B190/	Develop strategy regarding responses to Texas and Connecticut plaintiffs' motions for summary judgment.	0.50

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06/12/2023	C. Stephenson	B190/	Review and analyze exhibits (4.2); review and revise draft responses and objections (7.9); calls and conferences regarding same (1.5).	13.60
06/12/2023	E. Weaver	B190/	KeyCite and case pull of In re Scarborough, 516 B.R. 897 (Bankr. W.D. 2014).	0.20
06/12/2023	E. Weaver	B190/	Review draft of Texas response to motion for summary judgment for definitions and prepare list of same.	2.80
06/12/2023	R. Yates	B190/	Continue to monitor drafts, make edits, coordinate reviews of final draft of response to summary judgment.	4.10
06/12/2023	J. Yoon	B190/	Analyze, review, and strategize current briefing progress and assignments required for filing and not duplicate work.	0.70
06/12/2023	J. Yoon	B190/	Revise the debtor's declaration (0.5); draft and prepare signature blocks, certificates of services, and exhibits of the response briefs and the Objections and Responses to the tort claimants' Statement of Undisputed Material Facts against both Texas and Connecticut tort claimants' summary judgment motion (0.6); draft and revise response to Connecticut tort claimants' summary judgment motion and finalize citations to conform to Bluebook (8.3).	9.40

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06/13/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	3.20
06/13/2023	J. Davis	B190/	Final review of both MSJ response briefs and exhibits before filing.	2.00
06/13/2023	V. Driver	B190/	Work on brief responding to motion for summary judgment in TX non-dischargeability action and prepare for filing (3.9); call with client reviewing revised affidavit in support of both responses to MSJs in TX and CT (.6); final approval from client over text (.3); review edits to objections to MSJ evidence and statements of undisputed material fact (.7); review and analyze conclusion comments (.8).	6.30
06/13/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 12 Monday (4.0); summarize statements made related to case (.2)	4.20
06/13/2023	D. McClellan	B190/	Revise responses to Texas and Connecticut plaintiffs' motions for summary judgment and prepare for filing	8.90

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06/13/2023	T. Rinck	B190/	Draft and build comprehensive Table of Contents and Table of Authorities to include an index of all case citations in support of Defendant Alexander E. Jones' Objection and Response to Movants' Motion for Summary Judgment (Doc. 27), indexing 53-page Objection and Response.	3.40
06/13/2023	T. Rinck	B190/	Draft and build comprehensive Table of Contents and Table of Authorities to include an index of all case citations in support of Defendant Alexander E. Jones' Objection and Response to Movants' Motion for Summary Judgment (Doc. 58), indexing 43-page Objection and Response.	2.90
06/13/2023	C. Stephenson	B190/	Review and revise Responses and Objections to Motions for Summary Judgment and Objections to Exhibits and Statements of Uncontested Facts (8.3); review and respond to related correspondence (2.1).	10.40

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06/13/2023	E. Weaver	B190/	Revise, finalize and file defendant's response to movant's motion for summary judgment in both adversary proceedings (4.4); serve same via email to parties-in-interest for each adversary (.5); search for email addresses for parties-in-interest in the Wheeler adversary (.4).	5.30
06/13/2023	R. Yates	B190/	Confer with Deric J. McClellan regarding final edits to summary judgment response brief to ensure consistency	0.60
06/13/2023	J. Yoon	B190/	Revise response briefs, statements of undisputed facts, and objections and responses to tort claimants' statements of undisputed facts and finalize for filing and service for both the Texas and Connecticut tort claimants' summary judgment motions.	7.70
06/14/2023	V. Driver	B130/	Correspondence regarding potential of auctioning off personal items to receive higher value.	0.70

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06/14/2023	V. Driver	B140/	Email seeking clarification of estimates regarding AJ and FSS in Fontaine where AJ has been dismissed. (.3) Analyzing affidavit from B. Schleizer needed in support of 9019 (.3); call with J. Hardy on modifications of 9019 orders requested by Judge. (.4) Clarifying need for B. Schleizer affidavit in support of 9019. (.1)	1.10
06/14/2023	V. Driver	B160/	Sending Martin firm invoices to AJ notice parties for May fees. (.2)	0.20
06/14/2023	V. Driver	B190/	Correspondence regarding draft counteroffer (.5); emails regarding production protocol revisions needed to prevent disclosure of personal information (.4); emails to accounting to set up escrow account for pro fee escrow (.2); review and analyze information needed in 2004 to committee (3); draft correspondence with PQPR on settlement status (.1).	1.50
06/14/2023	V. Driver	B195/	Travel to and from Austin for meetings with client and P. McGill (5.6) [billed at half-time]	2.80

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06/14/2023	V. Driver	B210/	Analyze need for motion to approve post-petition contracts (.6); meeting with R. Battaglia and P. McGill on status of FSS operations (1.2); call with R. Battaglia on various FSS matters (.7); review status of Youngevity demands for accounting and contracts (.3); review and revise stipulation provisions for resolution to employment agreement modification (9).	3.70
06/14/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 13 Tuesday (4.0); summarize statements made related to case (.3).	4.30
06/14/2023	C. Stephenson	B120/	Review and respond to multiple correspondence regarding estate efforts to centralize and recover estate assets (1.8); conferences regarding same (.7).	3.80
06/14/2023	C. Stephenson	B140/	Calls and correspondence regarding hearing and related matters.	1.40
06/14/2023	E. Weaver	B190/	Procure Schleizer declaration and file-stamped copy of 9019 motion and circulate to team.	0.40

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06/14/2023	J. Yoon	B140/	Draft and revise Declaration of Robert Schleizer in Support of Debtors' Motion for Approval of Compromise and Settlement under Federal Rule of Bankruptcy Procedure 9019 (2.1); review motion for approval of compromise and settlement under Federal Rule of Bankruptcy Procedure 9019 in preparation to draft declaration in support (1.1); review pertinent correspondences and cost estimate of Fertitta Reynal LLP to incorporate into Declaration of Robert Schleizer (0.8).	4.00
06/15/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive documents in response to requests for production by the UCC. [NO CHARGE]	0.60
06/15/2023	C. Craig	B190/	Develop strategy for obtaining materials responsive to UCC 2004 requests. [NO CHARGE]	0.30
06/15/2023	C. Craig	B190/	Review and analyze extensive documents in response to requests for production by the UCC.	4.00
06/15/2023	L. Dauphin	B190/	Prepare supplemental client document production.	0.10
06/15/2023	V. Driver	B110/	Draft strategic list of items to accomplish in case and analyze staffing to accomplish tasks timely.	1.10

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06/15/2023	V. Driver	B140/	Review and revise ESG demand letter (.7); review contracts between ESG and FSS and AJ for support of the demand letter (.4); review comments and prepare for sending (.1).	1.20
06/15/2023	V. Driver	B160/	Analyze best practices on partial monthly fee statement and deadlines in interim compensation order and respond to BlackBriar on same. (.3)	0.30
06/15/2023	V. Driver	B170/	Correspondence with B. Schleizer on Teneo fee analysis.	0.30
06/15/2023	V. Driver	B190/	Call with Mediator on settlement terms (.8); call with B. Schleizer on call results (.4); call with client and B. Schleizer on mediator call results (.9).	2.10
06/15/2023	V. Driver	B190/	Emails on AJ deposition dates (.1); emails regarding payment for phone repair/data restoration (.2); emails on Contini invoices and breach of document request and analysis of presenting invoices. (.4)	0.70

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06/15/2023	V. Driver	B210/	Call on review protocol for remaining data to be produced (.8); emails to team members on same (.2); emails updating on stipulation on employment agreement progress (.2); review and revise motion to approve book contracts (.9); review book contracts confidentiality provisions and evaluate portions for redaction (.7); emails with agency and to publisher on sealing details (.2).	3.00
06/15/2023	A. Finch	B190/	Revise Production Protocol re: 2004 requests.	0.90
06/15/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 13 Wednesday (4.0); summarize statements made related to case (.2).	4.20
06/15/2023	T. Smith	B190/	Multiple emails with team to discuss production protocol and conference call scheduling.	0.20
06/15/2023	C. Stephenson	B120/	Draft Motion to Approve Book Contracts and related correspondence.	1.80
06/15/2023	C. Stephenson	B140/	Review and revise Violation of Automatic Stay Letter and related correspondence.	1.60
06/15/2023	C. Stephenson	B160/	Calls and correspondence regarding employment engagement for N. Pattis.	1.30

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06/15/2023	E. Weaver	B190/	Pull Scarborough case and review keycites for same for the response to motion for summary judgment.	0.30
06/15/2023	E. Weaver	B190/	Draft demand letter to Johnnie Patterson regarding ESG contract.	1.00
06/15/2023	J. Yoon	B160/	Draft and revise application to hire Norm Pattis (1.9); analyze and review filings regarding Norm Pattis in the FSS bankruptcy (1.5).	3.40
06/15/2023	J. Yoon	B170/	Call with Robert Schleizer regarding Teneo fee objections analysis (0.3); review and analyze Teneo's first three fee statements (0.2).	0.50
06/15/2023	J. Yoon	B190/	Analyze and strategize email review protocols in response to UCC's Rule 2004 Examination.	0.30
06/16/2023	C. Craig	B190/	Develop strategy for obtaining materials responsive to UCC 2004 requests. [NO CHARGE]	0.30
06/16/2023	C. Craig	B190/	Develop strategy for production of documents to the UCC in response to 2004 requests. [NO CHARGE]	0.70
06/16/2023	C. Craig	B190/	Review and analyze extensive documents in response to requests for production by the UCC.	3.00
06/16/2023	C. Craig	B190/	Prepare documents for production to the UCC.	0.30

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06/16/2023	C. Craig	B190/	Draft correspondence to UCC regarding document production by Debtor.	0.30
06/16/2023	L. Dauphin	B190/	Prepare Contini invoices received from Blackbriar for attorney review and redactions.	0.10
06/16/2023	V. Driver	B110/	Review and approve exemption objection extension stipulation and send email to UCC on same.	0.40
06/16/2023	V. Driver	B170/	Review and analyze analysis of Teneo monthly statements for sending objection under Interim Compensation Order (.6); review and revise email objection and send to notification parties (.4); emails with UCC counsel on objections to Teneo monthly fee statements (.3).	1.30
06/16/2023	V. Driver	B185/	Emails with agency and to publisher on sealing details.	0.80
06/16/2023	V. Driver	B190/	Emails on scheduling E. Jones deposition (.2); call with L. Freeman about settlement terms (.7); review and analyze settlement terms (.4).	1.30

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06/16/2023	V. Driver	B210/	Analysis of removal of lawsuit and potential violation of the discharge injunction (.7); review and initially analyze draft stipulation on employment agreement (.4); begin compiling listing of non exempt jewelry to be sold per stipulation with UCC (.2); call with R. Battaglia on status of all matters with FSS and settlement issues (.7).	2.10
06/16/2023	M. Figueroa	B190/	Conference call regarding document review/production and specific search terms.	0.50
06/16/2023	A. Finch	B110/	Revise Production Protocol re: 2004 requests.	0.60
06/16/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 14 Thursday (4.0); summarize statements made related to case (.3).	4.30
06/16/2023	T. Smith	B190/	Conference call with team to discuss document review and production protocol.	0.50
06/16/2023	C. Stephenson	B160/	Review and revise Application to Employ N. Pattis and supporting pleadings.	1.80
06/16/2023	C. Stephenson	B210/	Review and comment on stipulation and resolution language regarding employment agreement.	1.20
06/16/2023	C. Stephenson	B320/	Draft plan related correspondence.	2.30

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06/16/2023	E. Weaver	B140/	Review case docket entry continuing hearing on motion for relief from stay and docket new hearing date for same.	0.20
06/16/2023	E. Weaver	B210/	Draft motion for entry of an order authorizing debtor to file existing book contract and new contract under seal, along with proposed order.	2.20
06/16/2023	J. Yoon	B160/	Draft and finalize employment application to hire Norm Pattis.	3.10
06/16/2023	J. Yoon	B170/	Analyze and review the interim Compensation Procedure order regarding how to notice objection to fees (0.4); draft analysis email regarding objections to certain portions of Teneo's fees (1.2); draft and review email to UCC regarding objections to Teneo's fees (1.5).	3.10
06/16/2023	J. Yoon	B190/	Analyze, review, and strategize production protocols for next batch of document production in response to UCC's Rule 2004 examination.	0.60
06/17/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 15 Friday (4.0); summarize statements made related to case (.2).	4.20
06/19/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC. [NO CHARGE]	3.00

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06/19/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive client documents in response to requests by UCC and providing responses to requests for additional information from UCC. [NO CHARGE]	1.50
06/19/2023	V. Driver	B110/	Emails seeking clarification on schedules and statements amendments.	0.30
06/19/2023	V. Driver	B140/	Emails with A. Reynal on billings for De La Rosa and Fontaine matters.	0.30
06/19/2023	V. Driver	B160/	Emails with litigation counsel interim comp procedures.	0.20
06/19/2023	V. Driver	B170/	Call with committee counsel to discuss Teneo fee deferral.	0.80
06/19/2023	V. Driver	B190/	Emails seeking confirmation of dates for depositions and scheduling same.	0.30
06/19/2023	V. Driver	B210/	Discuss initiative to seek budget from litigators in TX to project expense in budget (.2); emails on redactions needed on book contracts to fulfill confidentiality provisions (.6).	0.80
06/19/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 18 Sunday (2.0); summarize statements made related to case (.1)	2.10
06/19/2023	T. Smith	B190/	Review, redact and code documents for production	2.20

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06/19/2023	T. Smith	B190/	Review and redact documents as needed	4.00
06/19/2023	T. Smith	B190/	Telephone call with Caylin C. Craig to discuss production and redaction.	0.20
06/19/2023	C. Stephenson	B160/	Review and revise draft application and declaration (1.6); draft related correspondence (.3); perform analysis regarding various estate professionals interim compensation issues (.8).	2.70
06/19/2023	C. Stephenson	B185/	Review and respond to correspondence regarding contract redaction matters.	0.80
06/19/2023	C. Stephenson	B190/	Draft and review correspondence regarding trial theory/strategy.	1.60
06/19/2023	E. Weaver	B160/	Email correspondence to and from Chrystal Madden regarding interim fee applications.	0.20
06/19/2023	E. Weaver	B190/	Draft debtor's 2004 examination for the UCC.	2.00
06/20/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	1.50
06/20/2023	L. Dauphin	B190/	Prepare supplemental client document production.	0.30
06/20/2023	V. Driver	B160/	Emails with S. Jordan on co-counsel coordination.	0.20
06/20/2023	V. Driver	B170/	Review summary from UCC on Teneo compromise and email to clarify same (.4); call with B. Schleizer to discuss Teneo offer (.3).	0.70

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06/20/2023	V. Driver	B210/	Redacting book contract and sending to publisher and agent for review and approval (.8); review comments and redact additional provisions accordingly (.3); review and revise book contract approval motion (.7).	1.80
06/20/2023	T. Smith	B190/	Review, redact and code documents in response to document request	7.30
06/20/2023	C. Stephenson	B160/	Correspondence regarding Application to Employ N. Pattis (.4); review and finalize application, declaration and proposed order (1.3).	1.70
06/20/2023	C. Stephenson	B190/	Review and analyze settlement proposal (.9); draft related correspondence (.8).	1.70
06/20/2023	C. Stephenson	B190/	Review and analyze discovery issues and related correspondence.	1.40
06/20/2023	C. Stephenson	B310/	Perform analysis and draft correspondence regarding administrative claims.	1.30
06/20/2023	E. Weaver	B160/	Revise, finalize and file application to employ Pattis & Smith, LLC, along with supporting declaration for same (.5); serve via email to the trustee and UCC (.2); docket objection deadline for same (.1).	0.80

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06/20/2023	R. Yates	B190/	Review and analyze final summary judgment response to prepare for hearing and possible appeal	1.60
06/20/2023	J. Yoon	B160/	Coordinate with Norm Pattis regarding his employment application and revising the application as requested.	1.90
06/20/2023	J. Yoon	B160/	Draft and revise the Declaration of Norman A. Pattis to be attached to the Employment Application of the same.	0.50
06/21/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	3.00
06/21/2023	V. Driver	B190/	Emails regarding place and time for depositions.	0.50
06/21/2023	T. Smith	B190/	Review and redact documents in response to document request from creditor's committee	3.00
06/21/2023	C. Stephenson	B160/	Review and revise certificates of no objection and proposed orders for professional fee applications.	1.60
06/21/2023	C. Stephenson	B310/	Draft correspondence regarding Youngevity matters.	1.10
06/21/2023	C. Stephenson	B310/	Perform analysis and draft correspondence regarding administrative claims.	1.30
06/21/2023	E. Weaver	B110/	Compile monthly operating reports in the FSS case and circulate fileshare link to team.	1.00

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06/21/2023	E. Weaver	B160/	Review case docket (.1); draft, finalize and file certificates of no objection to the first interim fee applications of Crowe & Dunlevy, Blackbriar Financial Advisors and Rachel Kennerly (1.3); prepare proposed order for same (.6).	2.00
06/21/2023	J. Yoon	B120/	Analyze correspondences and documents related to Youngevity in preparation to draft Rule 2004 examination of Youngevity for its contracts with Free Speech Systems and the debtor.	2.30
06/22/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	3.00
06/22/2023	L. Dauphin	B190/	Run pre-production quality checks.	0.60
06/22/2023	V. Driver	B190/	Review email on producing document and respond to same.	0.10
06/22/2023	V. Driver	B210/	Draft correspondence regarding revised redactions and seeking approval for filing (.2); call with T. Wulff on whiskey deal terms (.4); email seeking FTC expert and emails with same (.3).	0.90
06/22/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 19 Monday (4.0); summarize statements made related to case (.1)	4.10

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06/22/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 20 Tuesday (4.0); summarize statements made related to case (.1)	4.10
06/22/2023	C. Stephenson	B160/	Review and respond to interim compensation inquiry from estate professional.	0.40
06/22/2023	E. Weaver	B160/	Draft and file certificate of no objection regarding first interim fee application of Crowe & Dunlevy, BlackBriar Financial Advisors and Rachel Kennerly.	1.30
06/22/2023	E. Weaver	B190/	Review bank statements produced to the UCC in February (.2); email correspondence to and from Blackbriar regarding missing BoFA statements for November, 2022 (.3).	0.50
06/22/2023	J. Yoon	B120/	Draft and revise Rule 2004 examination of Youngevity regarding production of documents responsive to contracts or contract correspondences with Free Speech Systems or the debtor.	3.30
06/23/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	1.00
06/23/2023	C. Craig	B190/	Draft correspondence to UCC regarding document production by Debtor	0.30

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06/23/2023	L. Dauphin	B190/	Finalize pre-production review and prepare supplemental client document production.	1.40
06/23/2023	V. Driver	B160/	Call with UST on Norm Pattis employment and issues with Teneo fees.	0.90
06/23/2023	V. Driver	B210/	Call with FSS counsel on various operational issues.	1.10
06/23/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 21 Wednesday (4.0); summarize statements made related to case (.2).	4.20
06/23/2023	E. Weaver	B160/	ECF case management of orders granting first interim fee applications of Crowe & Dunlevy, BlackBriar Advisors, Rachel Kennerly and Jordan & Ortiz.	0.30
06/23/2023	E. Weaver	B160/	Submit and file proposed orders granting first interim fee applications for Crowe & Dunlevy, BlackBriar Financial Advisors and Rachel Kennerly.	0.40
06/24/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 22 Thursday (4.0); summarize statements made related to case (.3).	4.30

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06/25/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 23 Friday (4.0); summarize statements made related to case (.2).	4.20
06/26/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	2.50
06/26/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive client documents in response to requests by UCC and providing responses to requests for additional information from UCC. [NO CHARGE]	0.70
06/26/2023	V. Driver	B190/	Correspondence with UCC regarding deposition and document production status.	1.00
06/26/2023	V. Driver	B210/	Emails with R. Battaglia regarding timing to file motion to approve employment agreement (.1); call with B. Schleizer regarding client trip for family emergency and needs for remote show production budget (.4).	0.50
06/26/2023	A. Finch	B110/	Review series of emails with UCC regarding 2004 production/requests (.3); review and Revise Production protocol (.3).	0.60

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06/26/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 25 Sunday (2.0); summarize statements made related to case (.1).	2.10
06/26/2023	A. Sokolosky	B190/	Conference to discuss document production and discovery project.	0.90
06/26/2023	C. Stephenson	B190/	Perform analysis regarding settlement strategy (1.8); discuss staffing needs for various case matters (.7).	2.50
06/27/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	2.50
06/27/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive client documents in response to requests by UCC and providing responses to requests for additional information from UCC. [NO CHARGE]	0.50
06/27/2023	L. Dauphin	B190/	Conference call regarding document review protocol and process.	0.50
06/27/2023	L. Dauphin	B190/	Research in preparation of review team conference call.	1.10
06/27/2023	L. Dauphin	B190/	Apply redactions to attorney narratives and personal identifiable information.	1.50

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06/27/2023	V. Driver	B140/	Call with TX claimants discussing presentation in support of 9019 (.5); review and approve W&E list for 9019 motion (.5).	1.00
06/27/2023	V. Driver	B170/	Email with UST on Teneo fee issues.	0.10
06/27/2023	V. Driver	B190/	Call regarding document production matter (.4); call with document production team on progress on review and production (.8); review and revise settlement offer and send to group (.9); call with B Schleizer on settlement offer and defining income post-tax (.5).	2.60
06/27/2023	V. Driver	B210/	Emails seeking to set time to talk regarding influencer status as owner and FTC regulations.	0.30
06/27/2023	A. Finch	B110/	Review and Revise Production protocol.	0.60
06/27/2023	A. Sokolosky	B190/	Conference regarding document production and production protocol.	0.60
06/27/2023	A. Sokolosky	B190/	Perform analysis on preparation for document production.	2.80
06/27/2023	C. Stephenson	B190/	Analysis regarding settlement offer and related correspondence.	1.30
06/27/2023	E. Weaver	B110/	Begin drafting third amended schedules A/B and C (1.7); prepare email correspondence to Blackbriar regarding items requiring additional information. (.3)	2.00

Jones, Alex "AJ"

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June 30, 2023

Client # 50134

Invoice # 761699

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

06/27/2023	E. Weaver	B190/	Draft witness & exhibit list and file with the court (.7); compile pleadings for hearing notebooks for the hearings in both the AJ and FSS cases on 06-29-2023 (1.4).	2.10
06/27/2023	J. Yoon	B190/	Analyze and strategize document review and production protocol in response to UCC's Rule 2004 examination request.	0.70
06/28/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive client documents in response to requests by UCC and providing responses to requests for additional information from UCC. [NO CHARGE]	0.50
06/28/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	1.50
06/28/2023	L. Dauphin	B190/	Apply redactions to attorney narratives and personal identifiable information.	0.70
06/28/2023	V. Driver	B140/	Review and analyze ROR filed by CT and emails TX regarding same (.8); call with TX regarding ROR and terms of 9019. (.7)	1.50
06/28/2023	V. Driver	B170/	Emails with J. Ruff on Teneo resolution with UCC (.1); emails on Teneo fees and reserving identified portion until fee application. (.3)	0.40

Jones, Alex "AJ"

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

Post - petition

06/28/2023	V. Driver	B195/	Travel to Houston for hearings (billed at half time) (4.0).	2.00
06/28/2023	C. Stephenson	B310/	Review and revise Application for Administrative Expenses (.7); draft correspondence to R. Battaglia regarding same (.2).	0.90
06/29/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	4.50
06/29/2023	L. Dauphin	B190/	Apply redactions to attorney narratives and personal identifiable information.	1.10
06/29/2023	V. Driver	B110/	Emails with co-counsel on case status.	0.30
06/29/2023	V. Driver	B140/	Review invoicing from initial TX trial in advance of hearing on 9019 (.3); preparation for and attend hearing on 9019 to resolve stay motion with TX tort claimants (1.2); draft proffer for witness to support 9019 (.8); review and revise supporting declaration (.4).	2.70
06/29/2023	V. Driver	B185/	Emails seeking latest redactions on book contract for motion to approve.	0.20

Jones, Alex "AJ"

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

Post - petition

06/29/2023	V. Driver	B190/	Strategy regarding 2004 discovery from Youngevity for documents relating to agreements with AJ and related entities (.2); attend meeting with Sub V Trustee, McGill, Battaglia, and TX Tort Claimants on settlement (2.1); emails scheduling depositions (.2); emails on settlement offer and support for values in exhibit A (.2); emails on status of document production. (.8)	3.50
06/29/2023	V. Driver	B195/	Travel from Houston (billed at half time) (4.0)	2.00
06/29/2023	C. Stephenson	B140/	Analysis and correspondence regarding Motion for Willful Violation of Automatic Stay.	0.90
06/29/2023	C. Stephenson	B140/	Attend Lift Stay Hearing (.8); review and respond to related correspondence (.8).	1.60
06/29/2023	C. Stephenson	B185/	Analyze issues regarding Motion to approve Book Contracts.	1.10
06/30/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	1.00
06/30/2023	L. Dauphin	B190/	Complete pre-production quality and coding review (.6); prepare supplemental client document production (.6).	1.20
06/30/2023	V. Driver	B140/	Organizing call to discuss upcoming stay relief deadlines and trial budgeting.	0.30

Jones, Alex "AJ"

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

Post - petition

06/30/2023	V. Driver	B190/	Emails with tort claimant counsel regarding briefing deadline extension.	0.30
06/30/2023	V. Driver	B210/	Emails seeking payment of employment agreement salary increase after approval retroactive to June 1. (.2); emails regarding employment agreement confidentiality and attaching to admin expense application. (.3)	0.50
06/30/2023	C. Stephenson	B310/	Review and revise administrative claims application and proposed order (2.8); draft and review related correspondence (.6).	3.40
06/30/2023	E. Weaver	B310/	Revise and finalize Alex Jones' motion for allowance for administrative expense claim (.7); prepare proposed order for same (.6).	1.30

Total Hours	797.40
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Total Fees for this Invoice

\$341,392.00

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	8.70	3,643.50	Bankruptcy - Case Administration
B120	12.40	5,954.00	Bankruptcy - Asset Analysis and Recovery
B130	1.00	795.00	Bankruptcy - Asset Disposition

Jones, Alex "AJ"

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June 30, 2023Client # 50134
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Responsible Attorney
Vickie L. Driver

Post - petition

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B140	20.60	13,797.00	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B160	26.60	13,198.00	Bankruptcy - Fee/Employment Applications
B170	27.10	6,036.00	Bankruptcy - Fee/Employment Objections
B185	4.90	3,547.50	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	561.00	232,834.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	6.80	5,406.00	Bankruptcy - Non-Working Travel
B210	110.60	44,297.00	Bankruptcy - Business Operations
B240	5.80	4,047.00	Bankruptcy - Tax Issues
B310	9.60	6,192.00	Bankruptcy - Claims Administration and Objections
B320	2.30	1,644.50	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	797.40	\$341,392.00	

06/09/2023 VENDOR: Stephenson, Christina; INVOICE#: 761232; DATE: 6/9/2023 - CS; reimbursement for expenses for working lunch and travel expense for San Antonio Conference

\$101.67

Jones, Alex "AJ"

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

Post - petition

06/15/2023	Driver , Vickie reimbursement of travel expense to Austin Texas for meeting at clients office 6/14/2023; transportation \$ 62.31	62.31
06/16/2023	Driver , Vickie reimbursement of travel expense to Austin Texas for meeting at client's Office 6/14/2023; transportation \$ 365.53	365.53

Subtotal of Expenses	\$529.51
Subtotal of Costs	\$0.00
Total Expenses and Costs for this Invoice	\$529.51

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E110	427.84	Out-of-town travel
E111	101.67	Meals
Total	\$529.51	

Total For This Invoice	\$341,921.51
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Jones, Alex "AJ"

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

Post - petition

SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
L. Dauphin	19.50	185.00	3,607.50
T. Rinck	6.30	200.00	1,260.00
D. McClellan	137.20	310.00	42,532.00
A. Sokolosky	4.30	305.00	1,311.50
V. Driver	117.90	795.00	93,730.50
C. Stephenson	112.60	715.00	80,509.00
E. Weaver	31.10	295.00	9,174.50
A. Finch	89.80	305.00	27,389.00
T. Smith	19.90	400.00	7,960.00
M. Figueroa	3.90	250.00	975.00
R. Yates	61.30	340.00	20,842.00
N. Collins	4.70	675.00	3,172.50
C. Craig	63.30	220.82	13,978.00
J. Davis	20.00	475.00	9,500.00
J. Yoon	105.60	241.01	25,450.50
Total	797.40		\$341,392.00

EXHIBIT “C”

Seventh Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SEVENTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JULY 1, 2023 THROUGH JULY 31, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	07/01/2023	07/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$168,914.80 ¹ (80% of \$211,143.50)	
Total Reimbursable Expenses Requested in this Statement:	\$3,111.32 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$203,011.50	
Total Actual Attorneys Hours Covered by this Statement:	415.10	
Average Hourly Rate for Attorneys:	\$488.83	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$8,132.00	
Total Actual Paraprofessional Hours Covered by this Statement:	32.6	
Average Hourly Rate for Paraprofessionals:	\$249.45	

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Seventh Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from July 1, 2023 through July 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$168,914.80 (80% of 211,143.50) as compensation for professional services rendered to the Debtor during the period from July 1, 2023 through July 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$3,111.32, for a total amount of \$172,026.12 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$211,143.50 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$3,111.32 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$172,026.12 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX
Dated: August 31, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 737.218.6187
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on August 31, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	2019.45
Litigation support vendors	941.90
Express Courier Charges	149.97

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	5.4	9.1
B120 Asset Analysis and Recovery	4.0	.3
B130 Asset Disposition	13.1	.2
B140 Relief from Stay/Adequate Protection	11.3	.3
B150 Meetings of & Communications with Creditors	0.00	0.0
B160 Fee/Employment Applications	3.5	1.7
B170 Fee/Employment Objections	1.1	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	2.5	2.0
B190 Other Contested Matters	320.4	18.8
B195 Non-Working Travel	16.8	0.00
B210 Business Operations	32.5	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.00
B240 Tax Issues	2.6	.2
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	1.9	0.00
B320 Plan and Disclosure Statement	0.00	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	415.1	32.6

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

July 31, 2023
Invoice # 761700

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$211,143.50
Current Invoice Total Expenses	<u>\$3,111.32</u>
Current Invoice Total	<u>\$214,254.82</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 761700 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

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July 31, 2023Client # 50134
Matter # 00802Invoice # 761700
Responsible Attorney
Vickie L. Driver

Post - petition

07/02/2023	V. Driver	B160/	Emails with N. Pattis and Crissie W. Stephenson regarding amendments to application.	0.40
07/03/2023	V. Driver	B210/	Review and revise employment agreement (.6); email to Sub V Trustee and counsel for review and comment (.1).	0.70
07/03/2023	A. Finch	B190/	Review and Correct transcription of Voice Texts (to include making notes about relevancy, privilege, etc.).	2.50
07/04/2023	A. Finch	B190/	Review (approximately 110) Voice Notes to determine responsiveness to 2004 requests.	5.00
07/04/2023	E. Weaver	B110/	Continue work on third amended schedules and amended sofa.	3.50
07/05/2023	V. Driver	B190/	Call with TX Trial and appellate lawyers seeking budgeting for upcoming months to incorporate into AJ's and FSS budgets for TX appeal and upcoming trial.	0.70
07/05/2023	V. Driver	B210/	Draft correspondence regarding operations and review of employment agreement.	0.30
07/06/2023	V. Driver	B160/	Correspondence with N. Pattis regarding claims against estate.	0.40

Jones, Alex "AJ"

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July 31, 2023Client # 50134
Matter # 00802Invoice # 761700
Responsible Attorney
Vickie L. Driver

Post - petition

07/06/2023	V. Driver	B190/	Meeting on FSS/Debtor issues (1.0); review emergency motion for extension and respond to lawyers (.4); email Court to relay agreement with extension (.1).	1.50
07/06/2023	V. Driver	B210/	Call with Sub V Trustee and counsel walking through employment agreement comments and concerns (.8); review and revise employment agreement and send back to group for review and comment (.8).	1.60
07/06/2023	C. Stephenson	B310/	Perform analysis and draft related correspondence regarding administrative claims (.8); revise draft Application and proposed order (1.1).	1.90
07/06/2023	E. Weaver	B190/	Review emergency motion for an order to extend deadline to file reply for both adversary cases and circulate to team.	0.30
07/07/2023	V. Driver	B160/	Draft correspondence to financial advisors regarding additional claims (.4); call with client on employment agreement and other operational issues (.5); per client, send employment agreement to S. Jordan for review and comment. (.2)	1.10
07/07/2023	V. Driver	B190/	Draft correspondence regarding document production.	0.20
07/07/2023	V. Driver	B210/	Email and call regarding ESG analysis and FSS. (.5) Emails with team on production of documents. (.5)	1.00

Jones, Alex "AJ"

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July 31, 2023Client # 50134
Matter # 00802Invoice # 761700
Responsible Attorney
Vickie L. Driver

Post - petition

07/07/2023	A. Finch	B110/	Review Voice Notes to determine responsiveness to 2004 requests	0.20
07/07/2023	E. Weaver	B190/	Review stipulation and agreed order regarding schedule for answer and summary judgment briefing and docket reply deadline for both adversary cases.	0.30
07/09/2023	V. Driver	B190/	Review and respond to emails regarding E. Jones deposition scheduling and location.	0.30
07/10/2023	V. Driver	B110/	Draft correspondence to financial advisors regarding UST Fee notice.	0.20
07/10/2023	V. Driver	B190/	Call to discuss E. Jones deposition.	0.40
07/10/2023	V. Driver	B210/	Conference regarding FTC regs for media personality endorsements and marketing (.7); review and respond to S. Jordan comments to employment agreement. (.8)	1.50
07/10/2023	D. Palmer	B210/	Research regulatory issue regarding promotional activities.	1.00
07/11/2023	L. Dauphin	B190/	Identify and extract audio notes from Cellebrite report in preparation of production.	0.90
07/11/2023	V. Driver	B190/	Call with team on discovery progress.	0.50
07/11/2023	V. Driver	B190/	Call on matter with TDJ Restoration and next steps.	0.70

Jones, Alex "AJ"

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July 31, 2023Client # 50134
Matter # 00802Invoice # 761700
Responsible Attorney
Vickie L. Driver

Post - petition

07/11/2023	V. Driver	B210/	Review motion to approve book contracts and prepare for filing (.2); finalize redactions (.2).	0.40
07/11/2023	V. Driver	B210/	Review revisions to employment agreement from Sub V (.3); revise employment agreement and send to group seeking call to discuss same (.9). Review response to turnover motion filed by FSS. (.3)	1.50
07/11/2023	E. Weaver	B190/	Compile exhibits to motion for order sealing book contracts and circulate to team.	0.30
07/11/2023	E. Weaver	B190/	Review dallaseservice inbox and circulate to team request for supplemental clerk's record and request for supplemental reporter's record filed in the Travis County District Court.	0.40
07/11/2023	E. Weaver	B190/	Review and revise motion for order sealing book contracts.	0.70
07/12/2023	L. Dauphin	B190/	Prepare client document for attorney production review.	0.10
07/12/2023	V. Driver	B140/	Review ESG contracts and analyze payment calculations (.4); emails and calls with financial advisors on calculation of return (.6).	1.00

Jones, Alex "AJ"

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July 31, 2023Client # 50134
Matter # 00802Invoice # 761700
Responsible Attorney
Vickie L. Driver

Post - petition

07/12/2023	V. Driver	B190/	Draft correspondence producing boat title transfer documents from Reilly (.2); review and respond to correspondence with UCC regarding anonymous 2022 donor (.2); review correspondence seeking new dates for AJ and financial advisors (.3); review 2004 deposition notices. (.3)	0.90
07/12/2023	V. Driver	B195/	Travel to Austin (billed at half time 2.2)	1.10
07/12/2023	V. Driver	B210/	Draft and review multiple emails regarding Cicack Holdings issues with FSS and AJ and ESG. (1.2); call with Sub V Trustee and counsel on employment agreement (.4); review and revise same and send around to all interested parties (.6).	2.20
07/12/2023	D. McClellan	B190/	Review and analyze availability for Alex Jones deposition dates	0.20
07/12/2023	C. Stephenson	B185/	Review and revise Motion to Assume and approve Book Contracts (1.4); draft related correspondence (.3); draft proposed order (.8).	2.50
07/12/2023	C. Stephenson	B190/	Review and analyze UCC correspondence (.4); draft related correspondence (.3).	0.70
07/12/2023	E. Weaver	B120/	Search for objection filed in the FSS case to ESG's motion to turn over property and circulate to team.	0.30

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07/12/2023	E. Weaver	B185/	Revise, finalize and file motion to assume existing book contract and approve new contract (1.7); coordinate service of same (.3).	2.00
07/12/2023	E. Weaver	B190/	Review Glaston boat title and coordinate with litigation team to prep for document production.	0.20
07/13/2023	V. Driver	B190/	Call with client on E. Jones' deposition and preparation for same (.9); draft and review emails regarding status of voice text and memo review and production of same (.2); calls working through document production issues (1.3); review documents for production (1.7); draft and review correspondence regarding joint defense agreement for FSS and AJ. (.3); review emails regarding cancellation of E. deposition (.5); review alleged transfers to E. Jones (.4); conference with client regarding income and expenses (.8).	6.10
07/13/2023	V. Driver	B190/	Draft correspondence to co-counsel regarding emails needed to respond to discovery requests.	0.30
07/13/2023	V. Driver	B210/	Meeting with client to review employment agreement (.8); emails regarding book contract motion with UCC (.3).	1.10

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07/13/2023	A. Sokolosky	B190/	Review and analyze 2004 requests and assist with document production.	3.00
07/13/2023	C. Stephenson	B190/	Review correspondence regarding deposition changes and issues.	1.20
07/14/2023	V. Driver	B190/	Review and respond to correspondence regarding assistance for E. Jones team on deposition preparation (.5); Review correspondence regarding recovered damaged phone data (.4); review notice of rescheduling of E. Jones deposition (.2); preparation for and meeting with K. Porter on discovery issues (.2.6); draft follow up email with agreements and to dos for document production and discuss with team lead (.5); meeting with client on various discovery and related issues. (2.1); draft emails to Debtor staff seeking emails for production to UCC. (.4)	7.90
07/14/2023	V. Driver	B195/	Travel from Austin to Dallas (billed at half time 2.0)	1.00
07/14/2023	V. Driver	B210/	Review and respond to correspondence with UST regarding redacted book contracts.	0.30

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07/14/2023	V. Driver	B210/	Review discovery on admin claim application (.8); send financial questions to financial advisors for review and answer from bank account statements (4); call to Tyler Wulff regarding whiskey deal and connecting with counsel on FTC regs (.3); meeting with client on FSS operations, marketing and advertising issues. (.8)	2.30
07/14/2023	A. Sokolosky	B190/	Perform document review and assist with responding to 2004 requests.	3.70
07/14/2023	C. Stephenson	B190/	Review reply briefs.	4.40
07/14/2023	E. Weaver	B110/	Review and redact bank statements received from BlackBriar Advisors in support of May MOR.	1.00
07/14/2023	E. Weaver	B140/	Review 2004 examination notices to David Jones and Patrick Reilly and docket same.	0.30
07/14/2023	R. Yates	B190/	Review summary judgment briefing and record in preparation for hearing (Connecticut case)	1.60
07/14/2023	R. Yates	B190/	Review summary judgment briefing and record in preparation for hearing (Texas case)	1.90

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07/15/2023	V. Driver	B190/	Call with client regarding TX trial strategy and overall case strategy (.8); call with N. Pattis and client regarding same (.9); call with N. Pattis regarding same (.7). Brief review of TX and CT reply to briefs and emails staffing detailed review and discussion of same. (1.5)	3.90
07/15/2023	R. Yates	B190/	Prepare outline for hearing on summary judgment motion	2.20
07/16/2023	V. Driver	B190/	Call with C. Martin on background in TX case and discuss strategy going forward (.5); call with N. Pattis regarding Texas trial strategy. (.4)	0.90
07/17/2023	J. Davis	B190/	Reviewing the briefing and the cases cited in the summary judgment briefing of the CT Plaintiffs' case.	3.60
07/17/2023	V. Driver	B110/	Follow up on various pleadings to be filed in case to implement case strategy. (.8)	0.80
07/17/2023	V. Driver	B140/	Review and revise motion to enforce stay with ESG and prepare for filing.	1.30

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07/17/2023	V. Driver	B190/	Draft correspondence to UCC regarding document production (.1); meeting regarding software issues with data collection with team (.2); review summary of voice message review (.3); preparation for reply brief calls (.7); review and analyze issues with reply brief staffing and preparation for MSJ hearing (.6); strategy regarding dividing up argument sections (.7).	2.60
07/17/2023	V. Driver	B210/	Call with R. Battaglia on operational issues and potential settlement of administrative expense claim and correspondence regarding same.	0.80
07/17/2023	A. Finch	B190/	Review audio recordings for production responsive to 2004 requests from UCC.	2.40
07/17/2023	D. McClellan	B190/	Review and analyze reply brief of Texas plaintiffs	2.50
07/17/2023	A. Sokolosky	B190/	Perform document review in connection with 2004 requests.	3.10
07/17/2023	C. Stephenson	B140/	Review and revise Motion to Enforce the Automatic Stay and Proposed Order (2.3); review and respond to related correspondence (.8).	3.10
07/17/2023	C. Stephenson	B190/	Review and analyze Reply Brief (2.5); calls to discuss same (1.3).	3.80

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07/17/2023	E. Weaver	B130/	Review case docket for FSS and docket continued cash collateral hearing date.	0.20
07/17/2023	R. Yates	B190/	Read and analyze plaintiff's Connecticut reply brief in support of summary judgment	1.30
07/17/2023	R. Yates	B190/	Identify issues and cases from reply brief for use in preparation for hearing	2.10
07/17/2023	R. Yates	B190/	Organize legal arguments and formulate responses to plaintiff's legal positions	1.50
07/17/2023	R. Yates	B190/	Assess key arguments in plaintiff's reply brief	0.60
07/17/2023	J. Yoon	B120/	Draft and revise Rule 2004 Examination of Youngevity International	1.20
07/17/2023	J. Yoon	B140/	Draft and revise Emergency Motion to Enforce Automatic Stay against Elevated Solutions Group, LLC	4.10
07/18/2023	C. Chamberlain	B190/	Conference call with internal team of document reviewers regarding coding protocol for reviewing client documents and coding the same for production.	0.40
07/18/2023	L. Dauphin	B190/	Identify time stamp of recording sent to Greg Reese (.3); review and respond to correspondence regarding Cellebrite version used for reporting (.3).	0.60

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07/18/2023	J. Davis	B190/	Review of the CT Plaintiffs' MSJ and Brief, and Debtor's Response Brief, and the Plaintiffs Reply Brief.	3.50
07/18/2023	J. Davis	B190/	Call with client Alex Jones and counsel Vickie L. Driver to consult and advise on our perspective of all the MSJ briefing.	1.00
07/18/2023	J. Davis	B190/	Reviewing cases cited and briefing of the MSJ filings for the CT Plaintiffs to prepare for oral argument.	2.00
07/18/2023	V. Driver	B140/	Review and analyze ESG split between FSS/ESG and A. Jones (.4); revise and send to counsel for FSS to send to ESG's counsel for approval or comment (.5); emails with financial advisors regarding same (.4).	1.10

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07/18/2023	V. Driver	B190/	Draft and review emails regarding version of software used to gather phone data (.2); review emails rescheduling E. Jones deposition (.1); call with nondischargeability team to discuss reply and need for response thereto (.8); call with client and Chris Davis and Crissie W. Stephenson to advise client on status of nondischargeability cases (.9); review documents (1.3); review and analyze emails on information to be reviewed (.3); attend call with document review team to develop strategy to finish review by 7/31 (.8); review and analyze settlement counter proposal (1.8); review and respond to email from mediator on latest settlement proposal (.1); call with L. Freeman on status of case (.7).	8.30
07/18/2023	V. Driver	B195/	Travel to Austin (billed at half time 4.0)	2.00
07/18/2023	V. Driver	B210/	Call with FSS counsel on contracts for marketing and advertising that need to be executed ASAP (.3); email contracts to FSS counsel for review (.1); call with entire tort claimant team and FSS discussing potential resolution of administrative expense claim application (.9); email extending discovery period (.1).	1.40

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07/18/2023	A. Finch	B110/	Review audio recordings to determine responsiveness to UCC's 2004 requests	0.90
07/18/2023	D. McClellan	B190/	Develop strategy regarding document production for UCC request	0.50
07/18/2023	D. McClellan	B190/	Develop strategy regarding Texas and Connecticut plaintiffs' reply briefs	1.30
07/18/2023	T. Smith	B190/	Conference with document review team to discuss document review protocol and assignments	0.30
07/18/2023	A. Sokolosky	B190/	Confer and strategize with document review team regarding review protocol and process.	0.40
07/18/2023	A. Sokolosky	B190/	Confer with Vickie L. Driver regarding 2004 requests and document production.	0.30
07/18/2023	A. Sokolosky	B190/	Review, revise, and edit document review protocol.	1.40
07/18/2023	A. Sokolosky	B190/	Review and analyze first and second 2004 requests of the unsecured creditors committee.	2.60
07/18/2023	C. Stephenson	B190/	Calls and correspondence regarding reply briefs and analysis regarding same.	4.60
07/18/2023	R. Yates	B190/	Review and analyze reply in support of summary judgment in Texas case	1.20
07/18/2023	R. Yates	B190/	Conduct thorough review of reply brief and arguments contained therein.	1.50

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07/18/2023	R. Yates	B190/	Draft worksheet of key legal issues and cases for summary judgment hearing	1.20
07/18/2023	R. Yates	B190/	Formulate legal argument strategy for summary judgment hearing	0.50
07/18/2023	J. Yoon	B130/	Draft and revise motion to sell personal property.	3.90
07/18/2023	J. Yoon	B190/	Analyze and review document production and review protocols for UCC's Rule 2004 Examination	0.40
07/18/2023	J. Yoon	B190/	Analyze and review reply briefs filed in the Connecticut and Texas adversarial proceedings for issues to be potentially addressed during oral arguments or a surreply brief	0.50
07/19/2023	L. Dauphin	B190/	Identify and collect voice notes responsive to document production.	0.80
07/19/2023	V. Driver	B110/	Meeting with client discussing strategy of case moving forward (1.1); review reporting on travel expenses and budgeting with spouse and analyze same for MOR (.8).	1.90
07/19/2023	V. Driver	B160/	Meeting with C. Martin and N. Pattis on staffing on litigation and appeal (.8); review order of payment for professional fees and confirm same. (.4)	1.20

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07/19/2023	V. Driver	B190/	Analyze available dates for deposition of client and FA and email regarding same (.3); meeting with client discussing settlement counteroffer and potential response to same (1.3); discuss phone data retrieval with operation staff (.2); analyze information on thumb drive with team (.2); emails regarding firm who recovered data (.2); coordinating call to discuss potential transfers (.1); review 2004 for M. Jones (.2); emails with UCC counsel on date and conferring on date for same (.2).	2.70
07/19/2023	V. Driver	B195/	Travel from Austin to Dallas (4.0 - billed at half time)	2.00
07/19/2023	V. Driver	B210/	Draft and review emails regarding marketing contract forms and progress to execution (.4); draft and review emails regarding information on employment contract negotiation and document review regarding same. (.5)	0.90
07/19/2023	D. McClellan	B190/	Review and analyze Texas and Connecticut plaintiffs' reply briefs.	5.20
07/19/2023	R. Yates	B190/	Review comments on reply brief.	0.40

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07/19/2023	J. Yoon	B130/	Analyze and review statutes and case law regarding sale of personal property pursuant to section 363(f) in preparation to draft Motion for Order Approving Sale (2.3); analyze and review appraisal report and schedules in preparation to draft Motion for Order Approving Sale (2); draft and revise same (1.4).	5.70
07/20/2023	C. Chamberlain	B190/	Review client documents and code the same for production and confidentiality.	1.40
07/20/2023	L. Dauphin	B190/	Prepare responsive audio notes for final production review and redaction.	1.00
07/20/2023	V. Driver	B160/	Correspondence with co-counsel and coordinating efforts to prevent double billing.	0.40
07/20/2023	V. Driver	B170/	Reviewing fee statements and inquiry on appellate assistance from co-counsel.	1.10
07/20/2023	V. Driver	B190/	Call with counsel for Carol and David Jones discussing potential fraudulent transfers and potential defenses to same (.8); draft and revise settlement counter proposal (.9).	1.70
07/20/2023	V. Driver	B210/	Follow up with marketing on contract execution and progress. (.4)	0.40
07/20/2023	D. McClellan	B190/	Review documents to produce for UCC request.	2.50

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07/20/2023	T. Smith	B190/	Review and redact documents in response to request of Unsecured Creditor Committee.	2.00
07/20/2023	C. Stephenson	B190/	Client call regarding reply briefs.	0.80
07/20/2023	J. Yoon	B120/	Draft and revise Rule 2004 Examination regarding potential asset information held by the Committee of Unsecured Creditors.	2.30
07/20/2023	J. Yoon	B130/	Revise Motion for Sale of Personal Property.	2.70
07/21/2023	J. Davis	B190/	Continued review and study of CT Plaintiffs' motion for summary judgment briefing and reply brief.	1.50
07/21/2023	V. Driver	B190/	Emails with team on phone backup information accessibility and getting same on document review system to compare to other phone backup and de dupe.	0.90
07/21/2023	D. McClellan	B190/	Review documents to produce for UCC request.	4.80
07/21/2023	T. Smith	B190/	Review and redact documents in response to Unsecured Creditor Committee.	6.00
07/21/2023	E. Weaver	B110/	Review spreadsheets received from BlackBriar and draft MOR (with supporting schedules) for June, 2023.	3.40
07/22/2023	T. Smith	B190/	Review and redact documents in response to Unsecured Creditor Committee request.	2.00

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07/24/2023	V. Driver	B190/	Draft emails to UCC counsel on 2004 requests and production of documents received by UCC to Debtor to avoid unnecessary expense (.8); review documents for production (1.5); perform research on litigation counsel. (.5)	2.80
07/24/2023	V. Driver	B210/	Call with R. Battaglia on operational response issues and summarize in email to financial advisors (.9); emails with FSS counsel on CC budget items (.7); analyzing travel budget for August in CC budget. (.7)	2.30
07/24/2023	V. Driver	B240/	Review emails regarding Austin Shoprock property taxed by Travis County at FSS office space and analyze same.	0.90
07/24/2023	T. Smith	B190/	Review and redact documents in response to request of unsecured creditors committee.	2.10
07/24/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	1.80
07/24/2023	E. Weaver	B110/	Revise, finalize and file June MOR.	1.20

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07/24/2023	E. Weaver	B190/	Review 2004 examination notices to Marleigh Jones and FSS, along with rescheduled 2004 Examination notice to Erika Wulff-Jones and docket dates for same.	0.50
07/24/2023	R. Yates	B190/	Confer with litigation regarding issues in reply brief.	0.50
07/24/2023	J. Yoon	B190/	Analyze and review documents in preparation for production and response to UCC's Rule 2004 Examination.	2.10
07/24/2023	J. Yoon	B195/	Travel to debtor's office. (7.0) [billed at half-time]	3.50
07/25/2023	V. Driver	B130/	Review and Revise motion to sell personal property.	0.80
07/25/2023	V. Driver	B190/	Review and revise motion for 2004 document request to Youngevity (.8).	0.80
07/25/2023	V. Driver	B195/	Travel to Austin (nonworking travel billed at half time 3.4) – (1.7).	1.70

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07/25/2023	V. Driver	B210/	Meeting with client on various operational issues (1.2); call FSS counsel on issues with IT manager (.2); draft email to FSS counsel on IT manager issues (.4); meeting with Blackbriar, client and McGill on employment contract comments and finalizing (.5); draft emails to counsel for UCC regarding discovery and turning over documents received in response to 2004 requests served by Committee (.9); review The Wellness Company contract and submit to P. McGill for signature (.4); deliver executed contract to J. Harrmann and discuss format for additional contracts (.3).	3.90
07/25/2023	V. Driver	B240/	Analyze tax lawsuit against Austin Shiprock (1.0); email counsel for Travis County regarding stay (.7).	1.70
07/25/2023	A. Finch	B190/	Review and redact documents (emails) re: UCC's 2004 requests.	1.70
07/25/2023	T. Smith	B190/	Review and redact in response to the request of the unsecured creditors committee.	1.40
07/25/2023	A. Sokolosky	B190/	Begin drafting responses and objections to unsecured creditors committee's second 2004 requests.	3.30
07/25/2023	E. Weaver	B190/	Review 2004 Notice to Joseph Dalessio and docket date for same.	0.10

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07/25/2023	E. Weaver	B190/	Review email correspondence from UCC regarding 2004 examination for Marleigh Jones and Austin Rivera and docket updated dates for same.	0.30
07/25/2023	R. Yates	B190/	Continue to draft oral argument outline and supplement research	1.20
07/25/2023	R. Yates	B190/	Cite check and analyze plaintiff's reply to improper skew argument	0.90
07/25/2023	R. Yates	B190/	Read, analyze, summarize key cases and arguments relied on in plaintiff's reply brief	4.70
07/25/2023	J. Yoon	B120/	Revise and draft Notice of Debtor's 2004 Examination of Youngevity	0.50
07/26/2023	L. Dauphin	B190/	Manage and prepare additional discovery received from Digital Mountain for attorney production and privilege review.	4.80
07/26/2023	V. Driver	B140/	Draft correspondence to County Counsel on stay (.5); call to Travis County lawyers on stay (.2).	0.70

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07/26/2023	V. Driver	B190/	Meeting with Sub V Trustee counsel discussing business operations and settlement (2.); call to counsel for AMEX regarding payment made, amounts owed, and statements (.2); emails with Frost Bank and UCC seeking account statements (.9); call with E. Wulff on Frost statement progress (.4); work on revising settlement counter proposal (.9); discuss settlement offer terms with client (.4); draft correspondence regarding documents for production (.5); draft correspondence regarding follow up on data transfer for phone back up and issue with de-duping (.3).	5.60
07/26/2023	V. Driver	B195/	Travel to Houston from Austin for hearing (billed at half time 3.0)	1.50

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07/26/2023	V. Driver	B210/	Meetings and calls with client on potential new venture (1.1); calls with counsel for new venture partner discussing terms and documentation and timing (.7); emails with FSS disclosing potential new venture (.3); meeting with client on employment agreement comments (.7); review employment agreement and send to Sub V Trustee for comment (.3); review and revise stipulations for purposes of resolving increased salary and admin claim motion and send to UCC and FSS for review and comment (.7).	3.80
07/26/2023	A. Finch	B190/	Review and redact documents (emails) re: UCC's 2004 requests.	0.30
07/26/2023	A. Sokolosky	B190/	Draft responses and objections to unsecured creditors committee's first 2004 requests.	2.60
07/26/2023	A. Sokolosky	B190/	Revise and edit responses and objections to unsecured creditors committee's second 2004 requests.	0.80
07/26/2023	A. Sokolosky	B190/	Continue drafting responses and objections to unsecured creditors committee's second 2004 requests.	3.80
07/26/2023	E. Weaver	B160/	Review Teneo April monthly fee statement and circulate to team.	0.20

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07/26/2023	E. Weaver	B190/	Electronic document and case file management of bank account information and bank statements received from Frost Bank.	1.00
07/26/2023	E. Weaver	B190/	Review FSS's motion to quash UCC's Rule 2004 examination of FSS and circulate to team.	0.20
07/26/2023	E. Weaver	B240/	Review original petition (Travis County v. Austin Shiprock Publishing) and docket answer deadline.	0.20
07/26/2023	R. Yates	B190/	Continue to draft hearing preparation documents	1.10
07/26/2023	J. Yoon	B190/	Analyze, review, and categorize for further document production account reconciliation documents for debtor related entities.	1.90
07/26/2023	J. Yoon	B190/	Analyze and review debtor's phone backup images for responsive documents to the UCC's 2004 Examination	1.20
07/26/2023	J. Yoon	B195/	Travel to and from hotel to debtor's office and back to Dallas. [4.0 billed at half-time]	2.00
07/27/2023	L. Dauphin	B190/	Continue to manage and prepare additional discovery received from Digital Mountain for attorney production and privilege review.	2.50
07/27/2023	J. Davis	B190/	Meeting of the trial team to discuss dividing up the MSJ hearing into three categories.	0.60

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07/27/2023	J. Davis	B190/	Review and analyze 25 minute audio file from recent hearing with Judge Lopez regarding MSJ hearing.	0.40
07/27/2023	V. Driver	B110/	Preparation for and attend hearing on cash collateral, assumption of lease and general case status.	1.60
07/27/2023	V. Driver	B190/	Meeting with FSS and PQPR counsel discussing fraudulent transfer litigation, attempt to intervene by plaintiffs, and overall settlement issues (.7); call with FSS counsel on update on settlement discussions (.4).	1.10
07/27/2023	V. Driver	B195/	Travel from Houston to Dallas (billed at half-time 4.0)	2.00
07/27/2023	V. Driver	B210/	Draft emails seeking meet and confer and status conference on discharge MSJ (.8); calls and correspondence discussing Judge's comments regarding MSJ and potential status conference (2.1).	2.90
07/27/2023	A. Finch	B190/	Review and redact documents (emails) for production re: UCC's 2004 requests.	2.30
07/27/2023	D. McClellan	B190/	Develop strategy regarding possible evidentiary issues that need to be resolved before MSJ hearing	2.80
07/27/2023	D. McClellan	B190/	Review audio recording of status conference.	0.50

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07/27/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	2.10
07/27/2023	C. Stephenson	B190/	Draft and revise Responses and Objections to 2004 Exam requests and related correspondence.	3.80
07/27/2023	C. Stephenson	B190/	Review hearing audio regarding evidentiary issues (.6); call and correspondence regarding same (.8).	1.40
07/27/2023	R. Yates	B190/	Review arguments and counter-arguments regarding collateral estoppel standard in Connecticut (2.0); draft oral argument notes regarding the same (1.0).	3.00
07/27/2023	R. Yates	B190/	Confer regarding updates from the court on summary judgment hearing (.5); strategize about hearing preparation (.5); identify potential questions from the court (.3).	1.30
07/28/2023	C. Chamberlain	B190/	Review client documents and code the same for production and confidentiality.	0.40
07/28/2023	J. Davis	B190/	Review and study of the CT plaintiffs' MSJ briefing, case law cited, and exhibits.	4.30

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Vickie L. Driver

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07/28/2023	J. Davis	B190/	Prepare for the MSJ hearing on the 15th of August by discussing with legal team who the presentation of evidence and oral arguments will be structured and divided for the Court.	0.70
07/28/2023	V. Driver	B190/	Review and respond to voluminous emails on AJ deposition notice, topics, and ability to prepare (.9); call with N. Pattis on issues with appeal. (.5); review and revise 2004 responses and comment to same. (2.1); call with dischargeability trial team in advance of status conference with opposing counsels (.6); status conference with opposing counsels (.8); review and respond to emails pushing discovery on admin claim motion one week (.2).	5.10
07/28/2023	V. Driver	B210/	Review and comment to MugClub contract and review responses to same (.7); revise contract regarding comments (.7).	1.40
07/28/2023	M. Figueroa	B190/	Reviewed/Coded documents to determine responsiveness to petition/in preparation of production	0.60
07/28/2023	D. McClellan	B190/	Review documents to produce for UCC request	1.20
07/28/2023	D. McClellan	B190/	Call with Texas and Connecticut plaintiffs to discuss evidentiary issues	0.70

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

07/28/2023	D. McClellan	B190/	Develop strategy regarding evidentiary objections to plaintiff's MSJ exhibits	0.80
07/28/2023	T. Smith	B190/	Review and redact documents in response to request of Unsecured Creditors Committee	3.90
07/28/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	3.40
07/28/2023	C. Stephenson	B190/	Review and respond to correspondence regarding 2004 exam responses and objections.	1.20
07/28/2023	C. Stephenson	B190/	Correspondence and calls regarding evidentiary issues for MSJ hearing.	1.10
07/28/2023	E. Weaver	B160/	Begin drafting fourth and fifth fee monthly fee statements for BlackBriar.	1.50
07/28/2023	E. Weaver	B190/	Electronic case file management.	1.00
07/28/2023	R. Yates	B190/	Continue to develop counter arguments to petitioners assertions in their briefs	1.70
07/29/2023	V. Driver	B190/	Draft correspondence regarding production to be made on July 31st.	0.20
07/29/2023	D. McClellan	B190/	Review documents to produce for UCC request	6.20

Jones, Alex "AJ"

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Vickie L. Driver

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07/29/2023	T. Smith	B190/	Review and redact documents in response to request of Unsecured Creditors Committee	3.90
07/29/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	7.40
07/30/2023	C. Chamberlain	B190/	Review client documents and code the same for production and confidentiality.	6.80
07/30/2023	V. Driver	B210/	Review emails from FSS CRO on operational issues, objections to travel budget line-item processes, and personal feelings (.4); confer with client regarding same and potential need for replacement of CRO. (.4)	0.80
07/30/2023	A. Finch	B190/	Review and redact documents (emails) for production re: UCC's 2004 requests.	7.60
07/30/2023	D. McClellan	B190/	Review documents to produce for UCC request	10.40
07/30/2023	T. Smith	B190/	Review and redact documents in response to request of Unsecured Creditors Committee	2.60
07/30/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	8.60

Jones, Alex "AJ"

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Vickie L. Driver

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07/31/2023	C. Chamberlain	B190/	Review client documents and code the same for production and confidentiality.	3.30
07/31/2023	L. Dauphin	B190/	Prepare supplemental client document production.	2.70
07/31/2023	L. Dauphin	B190/	Manage and prepare additional discovery received from Digital Mountain for attorney production and privilege review.	0.10
07/31/2023	J. Davis	B190/	Review every line and citation of CT Plaintiffs' MSJ brief and begin working on outline for oral argument (3.0); review and study of the 100 Statement of Undisputed Facts alleged by CT Plaintiffs (3.0); work on argument points for the TX Plaintiffs MSJ (1.5).	7.50
07/31/2023	V. Driver	B190/	Review regarding document production as set to occur today.	0.20
07/31/2023	A. Finch	B190/	Review and redact documents (emails) for production re: UCC's 2004 requests.	10.30
07/31/2023	D. McClellan	B190/	Review documents to produce for UCC request.	8.10
07/31/2023	T. Smith	B190/	Review and redact documents in response to request of Unsecured Creditors Committee.	0.50

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Vickie L. Driver

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07/31/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	2.30
07/31/2023	A. Sokolosky	B190/	Facilitate document production to unsecured creditors committee.	1.60
07/31/2023	A. Sokolosky	B190/	Revise and finalize responses to unsecured creditors committee's 2004 requests.	0.90
07/31/2023	R. Yates	B190/	Review plaintiffs brief in support of summary judgment, thoroughly, and in great detail for preparation for the hearing.	6.60
07/31/2023	J. Yoon	B190/	Prepare for hearing and oral argument on motions for summary judgment in the adversarial proceedings.	1.90
07/31/2023	J. Yoon	B190/	Analyze, review, and prepare documents related to debtor-related entities in preparation for further document production reviews for responsiveness to UCC's 2004 examination.	0.50

Total Hours	447.90
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Total Fees for this Invoice

\$211,143.50

Jones, Alex "AJ"

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Vickie L. Driver

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SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	14.50	6,438.50	Bankruptcy - Case Administration
B120	4.30	1,228.50	Bankruptcy - Asset Analysis and Recovery
B130	13.30	4,200.50	Bankruptcy - Asset Disposition
B140	11.60	6,733.00	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B160	5.20	3,284.00	Bankruptcy - Fee/Employment Applications
B170	1.10	874.50	Bankruptcy - Fee/Employment Objections
B185	4.50	2,377.50	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	339.20	146,375.00	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	16.80	10,551.00	Bankruptcy - Non-Working Travel
B210	32.50	25,437.50	Bankruptcy - Business Operations
B240	2.80	2,126.00	Bankruptcy - Tax Issues
B310	1.90	1,358.50	Bankruptcy - Claims Administration and Objections
Total	447.70	\$211,143.50	

Jones, Alex "AJ"

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07/07/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of June 2023	\$871.00
07/12/2023	Texas Secretary of State Online Charge 1/1/2023 through 6/30/2023	1.00
07/12/2023	Texas Secretary of State Online Charge 1/1/2023 through 6/30/2023	1.00
07/12/2023	Texas Secretary of State Online Charge 1/1/2023 through 6/30/2023	2.00
07/17/2023	VENDOR: Federal Express Corporation; INVOICE#: 819843849; DATE: 7/27/2023 - Federal Express delivery to Lisa Dauphin on 7/18/2023	25.00
07/21/2023	Staine, Christopher reimbursement of retrieval of record fees 6/6/2023	58.60
07/21/2023	VENDOR: Federal Express Corporation; INVOICE#: 820618927; DATE: 8/1/2023 - Federal Express delivery to David Dang, Digital Mountain, Inc. on 7/24/2023	35.65
07/24/2023	VENDOR: Federal Express Corporation; INVOICE#: 820618927; DATE: 8/1/2023 - Federal Express delivery to Aloft Austin Southwest on 7/25/2023	89.32
07/28/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for review of production 7/12-14/2023; transportation \$ 571.79, lodging \$ 396.00 and meals \$ 264.35	1,232.14
07/28/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for document review and discussion 7/18-19/2023; transportation \$ 439.81, lodging \$ 204.67 and meals \$ 112.20	756.68
07/31/2023	Davis , Chris reimbursement for purchase of lunch for Chris Davis and Randall Yates during case preparation for Hearing on Motion for Summary Judgment 7/31/2023	30.63
Subtotal of Expenses		\$3,103.02
Online Research		\$8.30
Subtotal of Costs		\$8.30
Total Expenses and Costs for this Invoice		\$3,111.32

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E106	8.30	On-line research
E107	149.97	Delivery services/messengers
E110	1,988.82	Out-of-town travel
E111	30.63	Meals
E112	1.00	Court fees
E118	871.00	Litigation support vendors
E123	61.60	Other professionals
Total	<u>\$3,111.32</u>	

Total For This Invoice

\$214,254.82

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
L. Dauphin	13.50	185.00	2,497.50
D. McClellan	47.70	310.00	14,787.00
A. Sokolosky	53.10	305.00	16,195.50
V. Driver	115.50	795.00	91,822.50
C. Stephenson	30.50	715.00	21,807.50
C. Chamberlain	12.30	275.00	3,382.50
E. Weaver	19.10	295.00	5,634.50
A. Finch	33.20	305.00	10,126.00
T. Smith	24.70	400.00	9,880.00
M. Figueroa	0.60	250.00	150.00
R. Yates	37.00	340.00	12,580.00
J. Davis	25.10	475.00	11,922.50
J. Yoon	34.40	285.00	9,804.00
D. Palmer	1.00	395.00	395.00
Total	447.70		\$210,984.50

EXHIBIT “D”

Eighth Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**EIGHTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
AUGUST 1, 2023 THROUGH AUGUST 31, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	08/01/2023	08/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$240,270.00 ¹ (80% of \$300,337.50)	
Total Reimbursable Expenses Requested in this Statement:	\$20,532.34 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$280,427.50	
Total Actual Attorneys Hours Covered by this Statement:	631.8	
Average Hourly Rate for Attorneys:	\$443.85	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$19,910.00	
Total Actual Paraprofessional Hours Covered by this Statement:	72.6	
Average Hourly Rate for Paraprofessionals:	\$274.24	

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Eighth Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from August 1, 2023 through August 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$240,270.00 (80% of 300,337.50) as compensation for professional services rendered to the Debtor during the period from August 1, 2023 through August 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$20,532.34, for a total amount of \$260,802.34 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwelaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughttry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$300,337.50 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$20,532.34 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$260,802.34 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX
Dated: September 29, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 737.218.6187
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on September 29, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	3,892.06
Litigation support vendors	16,640.28

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	21.9	0.5
B120 Asset Analysis and Recovery	8.5	0.0
B130 Asset Disposition	1.8	0.0
B140 Relief from Stay/Adequate Protection	2.0	0.0
B150 Meetings of & Communications with Creditors	0.0	0.0
B160 Fee/Employment Applications	21.2	16.0
B170 Fee/Employment Objections	1.4	0.0
B180 Avoidance Action Analysis	0.0	0.0
B185 Assumption/Rejection of Executory Contracts	0.3	1.1
B190 Other Contested Matters	476.1	55.0
B195 Non-Working Travel	31.0	0.0
B210 Business Operations	39.4	0.0
B220 Employee Benefits/Pensions	0.0	0.0
B230 Financing/Cash Collections	0.0	0.0
B240 Tax Issues	10.1	0.0
B250 Real Estate	0.0	0.0
B260 Board of Directors Matters	0.0	0.0
B310 Claims Administration and Objections	0.0	0.0
B320 Plan and Disclosure Statement	18.1	0.0
B410 General Bankruptcy Advice/Opinions	0.0	0.0
B420 Restructurings	0.0	0.0
TOTALS:	631.8	72.6

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE & DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

September 29, 2023
Invoice # 763441

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$300,337.50
Current Invoice Total Expenses	<u>\$20,532.34</u>
Current Invoice Total	<u>\$320,869.84</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 763441 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

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September 29, 2023

Client # 50134

Invoice # 763441

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF PREVIOUS UNPAID INVOICES

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Amount Billed</u>	<u>Credits Applied</u>	<u>Balance Due</u>
754086	04/21/2023	215,770.53	-67,541.80	148,228.73
761699	06/30/2023	341,921.51	0.00	341,921.51
761700	07/31/2023	214,254.82	0.00	214,254.82
761710	05/31/2023	185,862.13	0.00	185,862.13
761722	08/31/2023	493,188.66	0.00	493,188.66
TOTALS:		<u>\$1,450,997.65</u>	<u>\$-67,541.80</u>	<u>\$1,383,455.85</u>

Jones, Alex "AJ"

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Client # 50134

Invoice # 763441

Matter # 00802

Responsible Attorney
Vickie L. Driver

Post - petition

08/01/2023	L. Dauphin	B190/	Prepare account reconciliations and month end reports for JLJR Holdings, LLC and PLJR Holdings, LLC for production review.	0.20
08/01/2023	J. Davis	B190/	Review and analyze Reply Brief filed in support of the MSJ.	2.50
08/01/2023	J. Davis	B190/	Review and analyze original complaints and the exhibits thereto.	4.00
08/01/2023	V. Driver	B190/	Call to discuss preparation for meet and confer and hearing on evidence and logistics.	0.70
08/01/2023	V. Driver	B210/	Review and analyze emails regarding operational issues raised by FSS CRO (.9); call with FSS to discuss operational issues (.9); calls with FA on operational issues (1.2); calls with client regarding same (1.2).	4.20
08/01/2023	D. McClellan	B190/	Review pleadings in preparation for plaintiffs' summary judgment hearing.	2.80
08/01/2023	C. Stephenson	B210/	Conference regarding operational issues raised by CRO (1.1); review related correspondence (.7).	1.80
08/01/2023	E. Weaver	B190/	Review application to employ Pattis & Smith and circulate to team.	0.20
08/01/2023	J. Yoon	B190/	Assist with evidentiary hearing preparations.	2.10

Jones, Alex "AJ"

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September 29, 2023

Client # 50134

Invoice # 763441

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

08/02/2023	J. Davis	B190/	Review and analyze court's verdict forms, ruling on default judgment, and 45 page ruling on punitive damages.	2.50
08/02/2023	J. Davis	B190/	Review and analyze non-dischargeability lawsuit and review the exhibits it cited to and attached.	2.50
08/02/2023	J. Davis	B190/	Review and analyze exhibits attached or cited to plaintiffs' non-dischargeability lawsuit.	4.00
08/02/2023	J. Davis	B190/	Review and analyze Appeal Brief filed in CT by the Alex Jones defendants.	2.00
08/02/2023	V. Driver	B210/	Call with financial advisors on initial results from operational meeting with AJ and FSS CRO.	1.10
08/02/2023	D. McClellan	B190/	Review and analyze summary judgment briefing and authorities cited within in preparation for summary judgment hearing.	4.50
08/02/2023	D. McClellan	B190/	Perform document review.	5.20
08/02/2023	C. Stephenson	B190/	Draft correspondence regarding evidentiary analysis.	0.80
08/02/2023	R. Yates	B190/	Continue to develop hearing strategy and prepare for hearing on summary judgment motion.	7.30

Jones, Alex "AJ"

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Client # 50134

Invoice # 763441

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

08/02/2023	J. Yoon	B190/	Prepare for oral arguments/summary judgment hearing for Texas and Connecticut adversarial proceedings (1.0); shepardize and research case law on dischargeability (1.0); draft email analysis regarding shepardized cases, and review issues in plaintiffs' evidentiary cites (1.1).	3.10
08/03/2023	J. Davis	B190/	Review and analyze CT trial court's ruling on Default Judgment (transcript of proceedings) and the 45 page written ruling on CUTPA claims and punitive damages.	1.50
08/03/2023	J. Davis	B190/	Review and analyze Lafferty Complaint from the underlying CT case.	1.50
08/03/2023	J. Davis	B190/	Review and analyze original jury charge (transcript of proceedings), and the verdict forms for all 15 plaintiffs.	1.00
08/03/2023	J. Davis	B190/	Review and analyze 5th Circuit and Houston Bankruptcy cases which provide the legal framework for the Court's role in evaluating 523(A)6 cases.	4.00
08/03/2023	V. Driver	B140/	Review ALLY bank MFR and analyze VIN Number issues.	0.40

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08/03/2023	V. Driver	B190/	Review and analyze email to FSS and Sub V Trustee clarifying position of plaintiffs in settlement (.8); draft correspondence regarding newest issues with ESG to FA for review with client (.6).	1.40
08/03/2023	V. Driver	B210/	Draft correspondence with final employment agreement and status and is finalized from AJ perspective (.8); call with R. Battaglia regarding same (.6); review revised contract and complete with addresses and send to counsel for MugClub (.3).	2.10
08/03/2023	A. Finch	B190/	Review and redact documents (emails) for production re: UCC's 2004 requests.	0.90
08/03/2023	D. McClellan	B190/	Review record submitted by Connecticut plaintiffs in preparation for summary judgment hearing.	10.30
08/03/2023	E. Weaver	B190/	Review and download voluminous filed pleadings and circulate Litshare link to team.	0.60
08/03/2023	E. Weaver	B190/	Westlaw case research for hearing.	0.50
08/03/2023	R. Yates	B190/	Develop arguments for evidentiary hearing and coordinate for moot court.	0.50
08/03/2023	R. Yates	B190/	Develop "actually litigated" argument for hearing.	2.20

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08/03/2023	R. Yates	B190/	Draft legal standard section for "necessarily decided" prong of collateral estoppel for summary judgment hearing.	3.00
08/03/2023	R. Yates	B190/	Read trial appellate brief (1.0); organize argument outline (1.0); define discussions and arguments (1.1).	3.10
08/03/2023	J. Yoon	B190/	Prepare for oral arguments/summary judgment hearing for both Texas and Connecticut Plaintiffs' adversarial proceedings - continue to categorize arguments and objections (3.5); strategize and analyze Connecticut state court appeal to incorporate into oral arguments (.4)	3.90
08/04/2023	L. Dauphin	B190/	Prepare additional document production review assignment groups.	0.60
08/04/2023	J. Davis	B190/	Review and analyze underlying trial testimony transcripts of Alderson and several of the plaintiffs which are identified as exhibits to the CT Plaintiffs' MSJ.	6.00
08/04/2023	V. Driver	B190/	Email document production manager seeking to keep production review going on assistant emails (.2); review and approve judicial notice motion (.6).	0.80
08/04/2023	V. Driver	B210/	Emails with J. Harmann on issues.	0.10

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08/04/2023	D. McClellan	B190/	Review and analyze Texas plaintiffs' summary judgment record in preparation for summary judgment hearing.	7.60
08/04/2023	A. Sokolosky	B190/	Analyze volume of document production and current level of reviewers (.4); discuss joining review with additional associates (.1).	0.50
08/04/2023	E. Weaver	B190/	Prepare electronic hearing notebook.	1.20
08/04/2023	E. Weaver	B190/	Document review in response to requests by UCC.	4.00
08/04/2023	R. Yates	B190/	Draft case summaries of key cases in briefing.	1.70
08/04/2023	R. Yates	B190/	Continue to analyze legal arguments and draft argument outline.	2.20
08/04/2023	J. Yoon	B190/	Analyze and review Connecticut adversarial complaint and exhibits in preparation for summary judgment hearing/oral arguments (1.3); draft email analysis of research findings (2.3); draft and revise the same (0.7).	4.30
08/05/2023	J. Davis	B190/	Review and analyze MSJ record submitted by CT Plaintiffs (1.5); review of 3 binders of exhibits, over 80 MSJ exhibits (1.5).	3.00
08/05/2023	D. McClellan	B190/	Review and analyze cases cited by Texas plaintiffs in summary judgment briefing in preparation for summary judgment hearing.	6.20

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08/05/2023	T. Smith	B190/	Review, redact and product documents in response to request of Unsecured Creditors Committee.	3.10
08/05/2023	R. Yates	B190/	Read, analyze, and summarize key cases for summary judgment hearing.	5.10
08/05/2023	R. Yates	B190/	Continue to outline arguments for summary judgment hearing.	1.20
08/05/2023	J. Yoon	B190/	Revise Motion Requesting the Court to Take Judicial Notice of Connecticut Appeal Brief applying additional case law and final changes (1.3); draft and revise proposed order granting the same (0.4).	1.70
08/06/2023	V. Driver	B190/	Review and respond to email on videos and impact on case for hearing presentation (.3); analyze evidentiary issues in advance of hearing (.9).	1.20
08/06/2023	V. Driver	B210/	Summarize MugClub deal and disclose to Committee.	1.60
08/06/2023	D. McClellan	B190/	Draft response to Texas and Connecticut plaintiffs' letter regarding evidentiary issues for August 7 evidentiary hearing.	4.10
08/06/2023	D. McClellan	B190/	Perform document review.	3.10
08/06/2023	T. Smith	B190/	Review and redact documents in response to request of Unsecured Creditors Committee.	3.50

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08/06/2023	C. Stephenson	B190/	Perform analysis and draft correspondence regarding contested hearing issues.	0.80
08/07/2023	C. Chamberlain	B190/	Conferences with Lucas Meacham and Kelly Kinser regarding UCC request document review (.6).	0.60
08/07/2023	J. Davis	B190/	Review and analyze opposition brief.	3.00
08/07/2023	J. Davis	B190/	Begin drafting and preparing an oral argument outline for the CT Plaintiffs MSJ.	4.00
08/07/2023	J. Davis	B190/	Trial team meeting regarding oral argument at the MSJ hearing.	0.50
08/07/2023	J. Davis	B190/	Attendance (Remote) at 3:00 status hearing with Judge Lopez and all parties of record.	0.50
08/07/2023	J. Davis	B190/	Prepare for evidence hearing.	1.80
08/07/2023	V. Driver	B190/	Meet and conference calls with plaintiffs on evidence objections and issues with same (2.5); attend hearing (.7); review results of hearing and preparation strategy in light thereof (.2); emails scheduling UCC call and pre-call with production team on document responses and production timing (1.4).	4.80
08/07/2023	V. Driver	B210/	Calls and emails regarding termination of FSS assistant and complications regarding same.	2.90

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08/07/2023	K. Kinser	B190/	Conference to discuss document review.	0.30
08/07/2023	K. Kinser	B190/	Perform document review.	8.70
08/07/2023	D. McClellan	B190/	Revise response to Texas and Connecticut plaintiffs' letter to the court regarding evidentiary issues for August 7 hearing.	3.10
08/07/2023	D. McClellan	B190/	Meet and confer with Texas and Connecticut plaintiffs regarding evidentiary issues for court's August 7 hearing.	1.30
08/07/2023	D. McClellan	B190/	Prepare for evidentiary hearing.	2.90
08/07/2023	D. McClellan	B190/	Attend evidentiary hearing.	0.50
08/07/2023	D. McClellan	B190/	Perform document review.	5.30
08/07/2023	L. Meacham	B190/	Correspondence regarding document review guidelines.	0.20
08/07/2023	T. Smith	B190/	Review, redact and produce documents in response to request of Unsecured Creditors committee.	0.80
08/07/2023	A. Sokolosky	B190/	Phone conference with Katherine Porter regarding production of documents received from third-parties.	0.10
08/07/2023	C. Stephenson	B190/	Review and analyze correspondence regarding production issues.	2.90

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08/07/2023	C. Stephenson	B190/	Review and revise Response to Comment (1.3); draft Court correspondence (.2); prepare for and attend evidentiary hearing (1.3).	2.80
08/07/2023	E. Weaver	B160/	Draft monthly June and July fee statements for BlackBriar Advisors.	1.80
08/07/2023	E. Weaver	B190/	Document review in response to requests by UCC.	3.00
08/07/2023	E. Weaver	B190/	Finalize and file defendant's comment regarding letter brief in both adversary cases.	0.80
08/07/2023	R. Yates	B190/	Advise on evidentiary issues and legal arguments for summary judgment hearing.	1.40
08/07/2023	R. Yates	B190/	Continue to develop summary judgment hearing presentation (1.0); debrief status conference (1.0); revise argument accordingly (1.2).	3.20
08/07/2023	R. Yates	B190/	Draft detailed description of due process arguments.	4.10
08/07/2023	R. Yates	B190/	Formulate strategies for opening statements.	0.50

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08/07/2023	J. Yoon	B190/	Analyze and review Texas and Connecticut Plaintiffs' letter regarding the evidentiary hearing and issues (0.5); analyze and review case law regarding evidentiary standards in preparation to draft response letter to the plaintiffs' letter (1.4); draft and revise response letter to plaintiffs' letter regarding evidentiary issues (1.2); attend remote status conference regarding the hearing on the summary judgment motions in the adversarial proceedings (0.4).	3.50
08/08/2023	J. Davis	B190/	Review and study of cases cited in Brief in Opposition to the CT Plaintiffs' MSJ.	6.50
08/08/2023	V. Driver	B190/	Review and respond to questions from production review team member.	0.80
08/08/2023	V. Driver	B210/	Call with R. Battaglia on operational issues and comments to MugClub contract (.8); review and comment to draft email to Teneo on budget questions (.4); emails and calls discussing harm to FSS and AJ estates if FSS CRO terminates assistant with no warning and no notice (1.7); emails seeking additional time and notice to employee to avoid administrative expense claim (.9); discuss strategy to mitigate damage with FA (.9).	4.90

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08/08/2023	K. Kinser	B190/	Document review and related internal correspondence analyzing same.	10.70
08/08/2023	D. McClellan	B190/	Draft hearing script for summary judgment hearing.	7.30
08/08/2023	D. McClellan	B190/	Perform document review.	4.20
08/08/2023	L. Meacham	B190/	Review and analyze email correspondence relating to Debtor's assets.	2.60
08/08/2023	T. Smith	B190/	Review, redact and produce documents in response to request of Unsecured Creditors Committee.	2.30
08/08/2023	T. Smith	B190/	Review, redact and produce documents in response to request of Unsecured Creditors Committee.	1.10
08/08/2023	C. Stephenson	B190/	Perform analysis and draft correspondence regarding hearing preparation (2.8); review exhibit lists (1.2); review and revise Debtor exhibit lists (.8).	4.80
08/08/2023	E. Weaver	B190/	Review response to movant's motion for summary judgment, circulate to team and docket objection deadline.	0.30
08/08/2023	E. Weaver	B190/	Document review in response to requests by UCC.	3.00
08/08/2023	R. Yates	B190/	Continue to develop argument for summary judgment hearing.	5.60

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08/08/2023	J. Yoon	B140/	Analyze and review Austin Shiprock v. Travis County case and strategize plan regarding same.	0.40
08/08/2023	J. Yoon	B190/	Analyze and review case law regarding collateral estoppel in preparation for summary judgment hearing.	1.10
08/09/2023	J. Davis	B190/	Review and analyze cases (3.0); draft oral argument (3.0); practice oral argument (3.0).	9.00
08/09/2023	K. Kinser	B190/	Perform document review.	8.30
08/09/2023	D. McClellan	B190/	Continue drafting hearing script for summary judgment hearing.	8.30
08/09/2023	D. McClellan	B190/	Perform document review.	6.60
08/09/2023	L. Meacham	B110/	Review and analyze documents relating to Debtor's assets.	6.00
08/09/2023	T. Smith	B190/	Review, redact and produce documents in response to request of Unsecured Creditors Committee.	0.90
08/09/2023	C. Stephenson	B190/	Review and analyze UCC's emergency motion to enforce Court ruling.	0.40
08/09/2023	C. Stephenson	B320/	Perform and analyze plan research.	2.70
08/09/2023	E. Weaver	B190/	Document review in response to requests by UCC.	3.50

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08/09/2023	E. Weaver	B190/	Download and review UCC's emergency motion to enforce 06-08-2023 ruling against Elevated Solutions Group, LLC.	0.20
08/09/2023	R. Yates	B190/	Create list of potential questions for oral arguments and moot court.	2.50
08/09/2023	R. Yates	B190/	Conduct moot court on first section of Texas case argument.	1.50
08/09/2023	R. Yates	B190/	Conduct legal research on statements of dicta being given preclusive effect in subsequent proceeding.	0.50
08/09/2023	R. Yates	B190/	Conduct multiple moot courts on Connecticut and Texas cases.	4.10
08/09/2023	J. Yoon	B190/	Prepare for oral arguments/summary judgment hearing - researching case law and summarizing arguments in anticipation of rebuttal.	1.50
08/10/2023	V. Driver	B110/	Emails on UST bill and invoicing.	0.10
08/10/2023	V. Driver	B170/	Analyzing issues with proposed order on Teneo fees.	0.60
08/10/2023	V. Driver	B190/	Analyzing status of document review (.4); answering inquiries from Committee on third party documents (.3).	0.70
08/10/2023	V. Driver	B190/	Email with courtroom deputy on hearing logistics.	0.10
08/10/2023	V. Driver	B190/	Review emergency motion filed by Committee on ESG document production.	0.20

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08/10/2023	V. Driver	B210/	Correspondence with Crowder CEO on operational issue.	0.20
08/10/2023	K. Kinser	B190/	Perform document review.	2.30
08/10/2023	D. McClellan	B190/	Prepare for summary judgment hearing by reviewing record, authorities cited, and hearing script.	6.20
08/10/2023	D. McClellan	B190/	Perform document review.	4.00
08/10/2023	L. Meacham	B110/	Review and analyze documents relating to Debtor's assets.	3.90
08/10/2023	A. Sokolosky	B190/	Prepare for phone conference with unsecured creditors committee by reviewing correspondence and 2004 requests and responses.	0.70
08/10/2023	A. Sokolosky	B190/	Phone conference with unsecured creditors committee regarding document production.	0.40
08/10/2023	A. Sokolosky	B190/	Review requests, responses, and documents produced; consider how best to respond to questions from unsecured creditors committee.	0.80
08/10/2023	C. Stephenson	B160/	Review billing statements for interim compensation preparation.	1.80
08/10/2023	C. Stephenson	B320/	Perform and analyze plan research.	4.30
08/10/2023	E. Weaver	B190/	Document review in response to requests by UCC.	5.00

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08/10/2023	E. Weaver	B190/	Review stipulation and agreed order regarding schedule for answering and summary judgment brief in both adversary cases and docket hearing date for same.	0.30
08/10/2023	R. Yates	B190/	Conduct moot court and debrief same.	1.90
08/10/2023	R. Yates	B190/	Draft oral argument summary on full faith and credit and free speech protection.	1.30
08/10/2023	R. Yates	B190/	Compile potential questions derived from briefing.	1.60
08/10/2023	R. Yates	B190/	Review and summarize key documents for hearing.	1.80
08/10/2023	J. Yoon	B190/	Analyze and review debtor documents and phone records for responsive documents to UCC's rule 2004 examination.	5.20
08/11/2023	B. Allen	B190/	Review and prepare L. Muniz email correspondence for production.	3.10

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08/11/2023	N. Collins	B240/	Correspondence with CPA regarding cost basis analysis for 2021 and 2022 gains/losses (.3); analyze worksheets regarding 2021 and 2022 cost basis, fair market value and gain/loss calculations (.9); craft correspondence to tax advisor regarding cost basis, fair market value and capital gain/loss reporting for 2021 and 2022 tax year (.5); discussion with Tyler Bennett regarding cost basis information (.7).	2.40
08/11/2023	K. Kinser	B190/	Perform document review.	4.80
08/11/2023	D. McClellan	B190/	Prepare for summary judgment hearing by reviewing record, authorities cited, and hearing script.	5.30
08/11/2023	D. McClellan	B190/	Perform document review.	3.00
08/11/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	2.30
08/11/2023	A. Sokolosky	B190/	Draft email to unsecured creditors committee regarding document production.	0.20
08/11/2023	C. Stephenson	B190/	Prepare for summary judgment hearing (.8); calls and correspondence regarding same (.5).	1.30

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08/11/2023	C. Stephenson	B320/	Perform and analyze plan research.	4.60
08/11/2023	E. Weaver	B190/	Coordinate procurement of bankruptcy documents from BK case in the SDNY.	0.60
08/11/2023	E. Weaver	B190/	Document review in response to requests by UCC.	4.00
08/11/2023	R. Yates	B190/	Conduct moot court for Connecticut case.	1.60
08/11/2023	R. Yates	B190/	Conduct moot court for Texas argument.	1.20
08/11/2023	R. Yates	B190/	Conduct round table discussions on cases relied upon in briefing.	3.50
08/11/2023	R. Yates	B190/	Draft argument sections on full faith and credit and due process.	0.90
08/11/2023	J. Yoon	B190/	Analyze and review debtor's phone records for documents responsive to UCC's rule 2004 examination.	2.70
08/12/2023	V. Driver	B190/	Review summary of document production call and respond as possible with information.	0.40
08/12/2023	D. McClellan	B190/	Prepare for summary judgment hearing by reviewing record, authorities cited, and hearing script.	5.50
08/12/2023	D. McClellan	B195/	Perform document review.	2.00
08/13/2023	J. Davis	B195/	Travel time one way from Tulsa to Houston [10.0 hours billed at half-time]	10.00

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08/13/2023	D. McClellan	B190/	Prepare for summary judgment hearing by reviewing record, authorities cited, and hearing script.	6.20
08/13/2023	D. McClellan	B195/	Travel to Houston for hearing [4.8 hours billed at half-time].	2.40
08/14/2023	J. Davis	B190/	Preparations for hearing (3.0); review of all exhibits; briefs, case law, practice presentation (3.0); moot court for TX and CT oral arguments (2.0).	8.00
08/14/2023	V. Driver	B110/	Emails on extension to object to exemptions.	0.20
08/14/2023	V. Driver	B190/	Preparation for hearing on MSJ.	0.80
08/14/2023	V. Driver	B190/	Emailing court on logistical issues in advance of hearing.	0.20
08/14/2023	V. Driver	B190/	Updates on third party subpoena.	0.60
08/14/2023	V. Driver	B195/	Travel to Houston (4.0) billing at half time.	2.00
08/14/2023	V. Driver	B210/	Analyze and discuss budgeting and related concerns from UCC.	1.80
08/14/2023	V. Driver	B210/	Review and revise stipulation resolving admin claim and raised salary for AJ and send to UCC, Sub V Trustee and FSS counsel for review and comment (1.1); emails extending objections deadlines on admin claim motion (.2).	1.30
08/14/2023	V. Driver	B210/	Emails regarding FSS operations.	1.50

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08/14/2023	K. Kinser	B190/	Perform document review.	3.80
08/14/2023	K. Kinser	B190/	Perform document review.	2.00
08/14/2023	D. McClellan	B190/	Prepare for summary judgment hearing by reviewing record, authorities cited, and hearing script.	10.50
08/14/2023	A. Sokolosky	B190/	Correspond with Sarah Mansfield regarding additional email account for document production.	0.30
08/14/2023	C. Stephenson	B190/	Prepare for hearings on Motions for summary judgment.	2.10
08/14/2023	C. Stephenson	B195/	Travel from Dallas to Houston [billed at half time 4.0].	2.00
08/14/2023	C. Stephenson	B320/	Meetings with Professionals regarding plan treatment matters.	4.20
08/14/2023	E. Weaver	B190/	Review spreadsheets received from BlackBriar Advisors and draft July monthly operating report.	3.00
08/14/2023	R. Yates	B190/	Draft response arguments for hearing on summary judgment.	1.00
08/14/2023	J. Yoon	B190/	Analyze and review Plaintiffs' Original Petition in matter Travis County, et al. v. Austin Shiprock Publishing, LLC, No. D-1-GN-23-003599 (0.3); draft, revise, and file original answer in response to the Travis County petition (1.1).	1.40

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08/14/2023	J. Yoon	B190/	Analyze and review debtor's cell phone records for documents responsive to UCC's rule 2004 examination.	2.20
08/15/2023	B. Allen	B190/	Review and analyze email correspondence of L. Muniz in preparation for producing same.	3.90
08/15/2023	L. Dauphin	B190/	Create additional document review assignments and review target list regarding images from backup retrieved from cloud storage.	0.60
08/15/2023	J. Davis	B110/	Attend overall case strategy meeting.	2.00
08/15/2023	J. Davis	B190/	Prepare for and attend on Motion for Summary Judgment.	5.00
08/15/2023	V. Driver	B110/	Prepare for and attend overall case strategy meeting.	2.90
08/15/2023	V. Driver	B190/	Preparation for and attend hearing on MSJ.	3.90
08/15/2023	V. Driver	B240/	Emails regarding taxation issue.	0.20
08/15/2023	K. Kinser	B190/	Perform document review and correspondence with Lisa Dauphin regarding production of same.	8.10
08/15/2023	D. McClellan	B190/	Prepare for summary judgment hearing.	3.00
08/15/2023	D. McClellan	B190/	Attend summary judgment hearing.	3.30
08/15/2023	D. McClellan	B195/	Travel from Houston to Tulsa (4.8 hours).	2.40

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08/15/2023	C. Stephenson	B110/	Prepare for and attend overall case strategy meeting (2.9); draft and review related correspondence (1.2).	4.10
08/15/2023	C. Stephenson	B190/	Prepare for and attend hearing on Motions for Summary Judgment.	3.10
08/15/2023	E. Weaver	B190/	Review valuation report and schedules (.6); prepare list of the boats, cars and watches with values to submit to the UCC (1.2).	1.80
08/15/2023	R. Yates	B190/	Attend summary judgment hearing remotely for potential appeal purposes.	3.30
08/15/2023	J. Yoon	B190/	Analyze and review debtor's phone records and coordinate production of documents responsive to UCC's rule 2004 examination.	2.80
08/15/2023	J. Yoon	B190/	Attend oral arguments/summary judgment hearing on the adversarial proceedings - provide real-time analysis, research, and support for the in-court hearing team.	1.70
08/16/2023	B. Allen	B190/	Review and analyze initial emails of S. Mansfield in preparation for document production (4.10); finalize review of additional email correspondence of L. Muniz in preparation for producing (1.5).	5.60

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Responsible Attorney
Vickie L. Driver

Post - petition

08/16/2023	N. Collins	B240/	Correspondence with FSS regarding conference call to discuss proposed plan of reorganization tax issues (.6).	0.60
08/16/2023	L. Dauphin	B190/	Review text message discovery for production.	0.40
08/16/2023	J. Davis	B195/	Travel time one way from Houston [9.0 billed at half-time].	4.50
08/16/2023	V. Driver	B190/	Discuss 2004 document request procedures.	0.40
08/16/2023	V. Driver	B195/	Travel from Houston (4.0 billed at half-time).	2.00
08/16/2023	V. Driver	B210/	Initial review of contract and terms on bourbon deal and respond via email to same.	0.20
08/16/2023	K. Kinser	B190/	Perform document review.	3.10
08/16/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	0.80
08/16/2023	C. Stephenson	B195/	Travel from Houston to Dallas [billed at half time 4 hours].	2.00
08/16/2023	C. Stephenson	B320/	Perform research and analysis regarding plan issues.	2.30

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Vickie L. Driver

Post - petition

08/16/2023	J. Yoon	B190/	Analyze and research public corporate filings and records of Youngevity International, Inc. for service and conference purposes (0.9); analyze and review Local Rule 2004-1(d) in preparation to draft rule 2004 examination (0.2); draft and revise Notice of Debtor's Rule 2004 Examination of Youngevity International, Inc. (3.1); attempt to confer with Youngevity International, Inc. for purposes of certificate of conference of the debtor's rule 2004 examination (0.4).	4.60
08/17/2023	N. Collins	B240/	Conference call with FSS regarding tax issues related to plan of reorganization (2.4); correspondence with CPA regarding same (.4).	2.80
08/17/2023	L. Dauphin	B190/	Document review.	2.20
08/17/2023	V. Driver	B110/	Check on status of multiple matters in case and confirming deadlines on same.	0.80
08/17/2023	V. Driver	B110/	Review and approve exemption objection extension for filing.	0.30
08/17/2023	V. Driver	B160/	Review Martin firm invoice and send to BBA for accounting.	0.30
08/17/2023	V. Driver	B210/	Emails with J. Harmaan on marketing efforts.	0.30

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Vickie L. Driver

Post - petition

08/17/2023	V. Driver	B210/	Review and revise Bourbon contract and send to counter party for review and approval (1.7); emails regarding modifications sought (.2).	1.90
08/17/2023	A. Sokolosky	B190/	E-mail exchanges with debtor's assistant regarding additional email address and obtaining access.	0.20
08/17/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	2.10
08/17/2023	C. Stephenson	B110/	Correspondence with co-counsel regarding various matters.	0.20
08/17/2023	E. Weaver	B190/	Finalize and file debtor's 2004 production request to Youngevity and docket response date for same (.4); review Texas Plaintiff's 2004 notices to Erika Wulff-Jones and Patrick Reiley and docket date for same (.4).	0.80
08/17/2023	J. Yoon	B190/	Finalize and coordinate service of debtor's rule 2004 examination of Youngevity International, Inc. (0.5); draft and revise debtor's rule 2004 examination of UCC (2.7).	3.20

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Vickie L. Driver

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08/18/2023	N. Collins	B240/	Conference call with Bob Schleizer and Rachel Kennerly regarding proposed plan of reorganization tax implications (.9); call with CPA regarding prior year reporting implications of proposed plan of reorganization issues (.5); correspondence with Tyler Elliot regarding cost basis reporting for 2021 and 2022 (.5).	1.90
08/18/2023	V. Driver	B130/	Send draft sale motion to UCC.	0.10
08/18/2023	V. Driver	B190/	Correspondence on claim and lawsuit answer date.	0.20
08/18/2023	V. Driver	B210/	Review emails on admin claim motion and request meeting to discuss with FSS (.4); call with UCC on Admin claim issues (.8).	1.20
08/18/2023	V. Driver	B210/	Draft short opportunities contract and send to counsel for FSS and FSS for review and comment.	1.20
08/18/2023	E. Weaver	B110/	Review and update list of upcoming deadlines and circulate to team.	0.50
08/18/2023	E. Weaver	B185/	Draft certificate of no objection to motion to assume existing book contract and approve new contract.	0.80
08/18/2023	E. Weaver	B190/	Document review in response to requests by UCC.	3.00

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Vickie L. Driver

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08/18/2023	E. Weaver	B190/	Download and review July bank statements supporting July monthly operating report.	0.40
08/18/2023	R. Yates	B190/	Debrief summary judgment hearing.	0.50
08/18/2023	J. Yoon	B130/	Review and revise motion for sale and proposed order in preparation to send to UCC counsel for review (0.7); email Sara Brauner a draft of the same (0.2).	0.90
08/18/2023	J. Yoon	B190/	Draft and revise debtor's rule 2004 examination of UCC.	1.90
08/19/2023	V. Driver	B210/	Review and respond to FSS regarding termination of assistant without notice (.5); perform analysis regarding administrative risks to estate (.5).	1.00
08/19/2023	A. Sokolosky	B190/	Conduct document review to produce documents in response to unsecured creditors committee's 2004 requests.	1.80
08/21/2023	N. Collins	B240/	Correspondence and discussion with Bob Schleizer and Rachel Kennerly CPA regarding cost basis, gross income, gains and losses and tax reporting requirements for various contributions (.9); draft follow-up correspondence to Tyler Elliot regarding cost basis and fair market calculations for various contributions (.4).	1.30

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Vickie L. Driver

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08/21/2023	L. Dauphin	B190/	Review client discovery for production and privilege.	0.50
08/21/2023	L. Dauphin	B190/	Receive additional email discovery from Digital Mountain and prepare for attorney production review.	0.20
08/21/2023	E. Weaver	B190/	Review emergency motion for protective order by Elevated Solutions Group and notice of hearing regarding same (.2); docket continued hearing date (.2).	0.40
08/21/2023	E. Weaver	B190/	Document review in response to requests by UCC.	3.00
08/21/2023	J. Yoon	B190/	Analyze and review rule 2004 examination-related pleadings between UCC and Elevated Solutions Group.	0.90
08/22/2023	L. Dauphin	B190/	Review client discovery for production and privilege.	1.90
08/22/2023	V. Driver	B110/	Review docket and hearing on ESG discovery dispute with UCC and prepare for hearing.	0.30
08/22/2023	V. Driver	B120/	Research regarding control for donation accounts.	1.10
08/22/2023	V. Driver	B130/	Review comments to sale motion from UCC and send to BBA for review.	0.80
08/22/2023	V. Driver	B210/	Emails regarding rescheduling call (.1); confirming sending book contract, Crowder and whiskey sharing with FSS (.2); analyzing admin claim and bifurcation issues with FSS (.2).	0.50

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08/22/2023	V. Driver	B210/	Call with contact to find executive search firm for FSS.	0.50
08/22/2023	E. Weaver	B160/	Review updated spreadsheets received from BlackBriar Advisors and revise fee statement drafts for May and June.	1.30
08/22/2023	E. Weaver	B190/	Review FSS's motion to quash UCC's rule 2004 examination and docket hearing date for same.	0.20
08/23/2023	L. Dauphin	B190/	Review client discovery for production and privilege.	1.30
08/23/2023	V. Driver	B110/	Provide client with updates on case.	1.10
08/23/2023	D. McClellan	B190/	Develop strategy regarding next steps after court issues order on summary judgment motions.	0.30
08/23/2023	E. Weaver	B160/	Email correspondence to and from BlackBriar Advisors regarding May and June fee statements.	0.20
08/23/2023	E. Weaver	B190/	Review agreed order granting motion for relief from stay regarding the 2020 Chevrolet Tahoe filed in the FSS case and circulate to team.	0.20
08/23/2023	E. Weaver	B190/	Review second rescheduled 2004 deposition of Erika Wulff-Jones and docket same.	0.20
08/23/2023	R. Yates	B190/	Discuss contingency plans for ruling on summary judgment motion.	0.60

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Vickie L. Driver

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08/23/2023	J. Yoon	B120/	Prepare for and attend rule 2004 examination deposition of Patrick Riley.	7.40
08/23/2023	J. Yoon	B190/	Attend hearing on Elevated solution Group's emergency motion to protect.	0.50
08/24/2023	V. Driver	B140/	Draft correspondence extending stay on TX trials.	0.20
08/24/2023	V. Driver	B170/	Analyze issues with Teneo fees.	0.80
08/24/2023	V. Driver	B185/	Review and approve CNO and order approving book contract motion.	0.30
08/24/2023	V. Driver	B190/	Correspondence with UCC on privilege log and production requests.	0.30
08/24/2023	V. Driver	B210/	Review and revise employment agreement regarding P. McGill comments and send to FSS counsel for review and comment (.6); review email comment and revise to address same (.3).	0.90
08/24/2023	V. Driver	B210/	Call with Crowder CEO on FSS staffing and related recruiting issues.	0.40
08/24/2023	V. Driver	B210/	Review email from Conspiracy Bourbon group.	0.20
08/24/2023	E. Weaver	B185/	Finalize and file certificate of no objection on motion to assume existing book contract and approve new contract.	0.30
08/25/2023	L. Dauphin	B190/	Review client discovery for production and privilege.	1.50

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Vickie L. Driver

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08/25/2023	V. Driver	B160/	Developing calendaring protocol for fee statements and interim fee applications.	0.80
08/25/2023	V. Driver	B190/	Review 2004 notice of T. Fruge and emails regarding issues with timing (.3); emails with FSS counsel on T. Fruge defense at deposition (.2).	0.50
08/25/2023	V. Driver	B190/	Emails regarding ESG's objection to UCC producing documents to Debtor.	0.50
08/25/2023	V. Driver	B210/	Analyzing support for July expenses (1.1); call with UCC on budget issues (.4); emails regarding same (.2).	1.70
08/25/2023	V. Driver	B210/	Review FSS budget and emails regarding travel expected in September.	0.80
08/25/2023	V. Driver	B210/	Resending revised employment agreement to FSS for review and approval.	0.10
08/25/2023	K. Kinser	B190/	Review document review guidelines and related e-mail correspondence.	0.20
08/25/2023	C. Stephenson	B160/	Review and revise billing statements for interim compensation preparation (4.3); draft related correspondence (1.4).	5.70
08/25/2023	J. Yoon	B190/	Analyze and review notes of Rule 2004 examination of Patrick Riley in preparation for Rule 2004 examination of debtor (.3); analyze and review notes from motion to protect hearing Vickie L. Driver (.2).	0.50

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Vickie L. Driver

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08/26/2023	V. Driver	B160/	Call with AJ regarding legal bill inquiries and management (.7); emails setting up meeting with TX trial team (.3).	1.00
08/26/2023	V. Driver	B160/	Emails to billers regarding time entry in BK for preparation of fee statements.	0.30
08/26/2023	C. Stephenson	B160/	Review and revise billing statements for interim compensation preparation (4.4); draft related correspondence (.8).	5.20
08/27/2023	V. Driver	B210/	Review and respond to emails on budgeting issues and send to BBA for discussion on same.	0.40
08/27/2023	K. Kinser	B190/	Perform document review.	5.90
08/28/2023	V. Driver	B210/	Drafting contract for opportunity share for interim period before employment agreement is approved (.8); follow up on employment agreement (.2); revise motion to approve contract and follow up on admin claim via email (.9) discuss same with FSS counsel (.6).	2.50
08/28/2023	V. Driver	B210/	Review BBA response to Teneo and revise same.	0.30
08/28/2023	K. Kinser	B190/	Perform document review.	1.00
08/28/2023	E. Weaver	B190/	Review the UCC's notice of 2004 deposition of Bob Schleizer & Debtor and docket dates for same.	0.30

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08/29/2023	N. Collins	B240/	Draft summary correspondence regarding income, gain or loss tax reporting with respect to in-kind contributions.	0.90
08/29/2023	L. Dauphin	B190/	Run pre-production conflict and quality checks.	1.70
08/29/2023	V. Driver	B140/	Review and analyze issues on crypto tax basis.	1.00
08/29/2023	V. Driver	B190/	Call with counsel for PQPR and David Jones on David Jones deposition.	1.20
08/29/2023	V. Driver	B210/	Calls and emails with UCC on employment agreement motion filed (1.3); call with FSS counsel on same (.6).	1.80
08/29/2023	K. Kinser	B190/	Perform document review.	1.00
08/29/2023	L. Meacham	B160/	Review and analyze billing requirements.	0.40
08/29/2023	E. Weaver	B160/	Draft May and June monthly fee statements for Crowe and Dunlevy.	3.80
08/29/2023	J. Yoon	B190/	Analyze and review local rules and case law regarding Rule 2004 examination time limits and procedures.	0.80
08/30/2023	L. Dauphin	B190/	Review client discovery for production and privilege.	0.50
08/30/2023	L. Dauphin	B190/	Continue to run pre-production conflict and quality checks.	1.20
08/30/2023	L. Dauphin	B190/	Review financial records and apply redactions to confidential information.	0.90

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Vickie L. Driver

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08/30/2023	V. Driver	B160/	Emails with TX trial team on stay extension, trial extension, and budgeting needed.	0.40
08/30/2023	V. Driver	B195/	Travel to Austin (3.5 - billed at half time).	1.70
08/30/2023	C. Stephenson	B190/	Attend emergency hearing regarding D. Jones 2004 examination (.7); draft related correspondence (.6).	1.30
08/30/2023	E. Weaver	B160/	Revise May and June monthly fee statements for Crowe & Dunlevy (1.3); draft July monthly fee statement (1.7).	3.00
08/30/2023	E. Weaver	B160/	Begin drafting spreadsheet of professional fees for all professionals the bankruptcy estate is responsible to pay.	1.00
08/30/2023	J. Yoon	B190/	Analyze and review scans of documents found in debtor's office for redactions prior to production in response to UCC's rule 2004 examination.	0.40
08/31/2023	V. Driver	B190/	Answering document production questions.	0.60
08/31/2023	V. Driver	B190/	Attend David Jones deposition.	6.20
08/31/2023	D. Harlan	B190/	Working on doc review (mostly e-mails) for expenses.	3.50
08/31/2023	K. Kinser	B190/	Perform document review.	3.30
08/31/2023	K. Kinser	B190/	Perform document review.	1.60

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Responsible Attorney

Vickie L. Driver

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08/31/2023	C. Stephenson	B160/	Review and revise fee statements and billing (3.1); draft and review related correspondence (1.4).	4.50
08/31/2023	C. Stephenson	B190/	Review and respond to Youngevity extension request.	0.40
08/31/2023	E. Weaver	B160/	Revise, finalize and file May and June monthly fee statements for BlackBriar Advisors (1.5); revise, finalize and file May, June and July monthly fee statements for Crowe & Dunlevy (3.0); serve via email to UCC and trustee (1.); draft May and June monthly fee statement for Rachel Kennerly (1.0); docket objection deadline for fee statements (.1).	5.70

Total Hours	704.40
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Total Fees for this Invoice

\$300,337.50

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	22.40	11,228.00	Bankruptcy - Case Administration
B120	8.50	2,983.50	Bankruptcy - Asset Analysis and Recovery
B130	1.80	972.00	Bankruptcy - Asset Disposition
B140	2.00	1,386.00	Bankruptcy - Relief from Stay/Adequate Protection

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SUMMARY OF TASKS

Task	Hours	Amount	Task Description
			Proceedings
B160	37.20	19,582.00	Bankruptcy - Fee/Employment Applications
B170	1.40	1,113.00	Bankruptcy - Fee/Employment Objections
B185	1.40	563.00	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	531.10	195,161.00	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	31.00	16,387.00	Bankruptcy - Non-Working Travel
B210	39.40	31,179.00	Bankruptcy - Business Operations
B240	10.10	6,841.50	Bankruptcy - Tax Issues
B320	18.10	12,941.50	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	704.40	\$300,337.50	

08/03/2023	Yoon, John reimbursement of travel expense to Austin Texas regarding case 7/25-26/2023; 410 miles x .655/mile	\$268.55
08/04/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of July 2023	3,731.00
08/08/2023	Davis , Chris reimbursement for dinner 8/3/2023 for/with Chris Davis, Deric McClellan and Randall Yates - preparing for Alex Jones	107.02

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status conference hearing scheduled 8/7/2023

08/14/2023	Davis , Chris reimbursement of meals for/ with Deric McClellan and Randall Yates in preparation of Motion for Summary Judgment Hearing 8/7-9/2023	130.60
08/14/2023	Driver , Vickie reimbursement of travel expenses to Austin, Houston and Dallas Texas for AJ/FSS Cash Collateral Hearing 7/25-27/2023; transportation \$ 258.00, lodging \$ 380.13 and meals \$ 50.50	688.63
08/17/2023	Stephenson, Christina reimbursement of travel expenses to Houston Texas for Motion for Summary Judgment 8/14-16/2023; transportation \$ 547.80 and lodging \$ 1379.20	1,927.00
08/17/2023	Driver , Vickie reimbursement of travel expenses to Houston Texas for Motion for Summary Judgment 8/14-16/2023; transportation \$ 567.79 and meals \$ 202.47	770.26
08/25/2023	VENDOR: Digital Mountain; INVOICE#: 8461.8505.8677; DATE: 8/25/2023 - Payment for Invoice Nos. 8461, 8505 and 8677	9,165.28
08/31/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of August 2023	3,744.00

Subtotal of Expenses

\$20,532.34

Total Expenses for this Invoice

\$20,532.34

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E110	3,654.44	Out-of-town travel
E111	237.62	Meals
E118	7,475.00	Litigation support vendors
E123	9,165.28	Other professionals
Total	<u>\$20,532.34</u>	

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Responsible Attorney

Vickie L. Driver

Post - petition

Total For This Invoice

\$320,869.84

SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
L. Dauphin	13.70	185.00	2,534.50
D. McClellan	137.40	310.00	42,594.00
K. Kinser	65.10	285.00	18,553.50
A. Sokolosky	10.20	305.00	3,111.00
V. Driver	83.80	795.00	66,621.00
C. Stephenson	66.10	715.00	47,261.50
C. Chamberlain	0.60	275.00	165.00
E. Weaver	58.90	295.00	17,375.50
A. Finch	0.90	305.00	274.50
T. Smith	11.70	400.00	4,680.00
L. Meacham	13.10	255.00	3,340.50
R. Yates	68.90	340.00	23,426.00
N. Collins	9.90	675.00	6,682.50
B. Allen	12.60	285.00	3,591.00
J. Davis	89.30	475.00	42,417.50
J. Yoon	58.70	285.00	16,729.50
D. Harlan	3.50	280.00	980.00
Total	704.40		\$300,337.50

EXHIBIT “E”

Ninth Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**NINTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	09/01/2023	09/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$170,632.80 ¹ (80% of \$213,291.00)
Total Reimbursable Expenses Requested in this Statement:		\$5,012.57 ²
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:		\$213,291.00
Total Actual Attorneys Hours Covered by this Statement:		436.00
Average Hourly Rate for Attorneys:		\$454.75
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:		\$15,018.00
Total Actual Paraprofessional Hours Covered by this Statement:		54.6
Average Hourly Rate for Paraprofessionals:		\$275.05

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Ninth Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from September 1, 2023 through September 30, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$170,632.80 (80% of \$213,291.00) as compensation for professional services rendered to the Debtor during the period from September 1, 2023 through September 30, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$5,012.57, for a total amount of \$175,645.37 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$213,291.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$5,012.57 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$175,645.37 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX
Dated: November 15, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 737.218.6187
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on November 15, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	4,670.57
Texas SOS online charge	1.00
Express Courier Charges	341.00

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	15.1	7.7
B120 Asset Analysis and Recovery	33.0	0.00
B130 Asset Disposition	3.3	0.00
B140 Relief from Stay/Adequate Protection	1.1	0.00
B150 Meetings of & Communications with Creditors	0.00	0.0
B160 Fee/Employment Applications	9.4	22.1
B170 Fee/Employment Objections	0.00	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	5.1	0.8
B190 Other Contested Matters	319.10	14.5
B195 Non-Working Travel	18.1	0.00
B210 Business Operations	23.5	2.4
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.5
B240 Tax Issues	0.00	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	0.00	6.6
B320 Plan and Disclosure Statement	8.3	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	436.00	54.6

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

October 31, 2023

Invoice # 765083

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$213,291.00
Current Invoice Total Expenses	<u>\$5,012.57</u>
Current Invoice Total	<u>\$218,303.57</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 765083 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF PREVIOUS UNPAID INVOICES

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Amount Billed</u>	<u>Credits Applied</u>	<u>Balance Due</u>
761699	06/30/2023	341,921.51	0.00	341,921.51
761700	07/31/2023	214,254.82	0.00	214,254.82
761710	05/31/2023	185,862.13	-8,891.79	176,970.34
761722	08/31/2023	493,188.66	0.00	493,188.66
763441	09/29/2023	320,869.84	0.00	320,869.84
TOTALS:		<u>\$1,556,096.96</u>	<u>\$-8,891.79</u>	<u>\$1,547,205.17</u>

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/01/2023	V. Driver	B110/	Calls with client regarding case matters.	0.50
09/01/2023	V. Driver	B140/	Emails regarding stay relief and continuing trial date.	0.30
09/01/2023	V. Driver	B190/	Review email from FSS CRO on refusal to give assistant to be terminated notice (.2); send email to R. Battaglia clarifying that timing on FSS filing the motion to employ the contract is not restricted by AJ legal team (.3); call with FSS regarding attempts to stem the admin expense claim if terminated FSS employee sues (.5).	1.00
09/01/2023	V. Driver	B190/	Emails regarding production scheduling and completion.	0.20
09/01/2023	V. Driver	B210/	Emails regarding Alex related URLs. (.2); emails regarding mediation discussion (.2).	0.40
09/01/2023	D. Harlan	B190/	Performed document review.	6.00
09/01/2023	K. Kinser	B190/	Perform document review.	8.80
09/01/2023	E. Weaver	B160/	Revisions to Rachel Kennerly's monthly fee statement for May and June (.5); email correspondence to and from Rachel Kennerly regarding July time (.2).	0.70

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney
Vickie L. Driver

Post - petition

09/01/2023	E. Weaver	B160/	Continue drafting spreadsheet of professional fees for all estate and UCC professionals.	2.00
09/01/2023	E. Weaver	B160/	Docket objection deadline for fifth, sixth and seventh monthly fee statements of Crowe & Dunlevy and fifth and sixth monthly fee statements of BlackBriar Advisors (.2); docket extended 2004 production request deadline (.2).	0.40
09/01/2023	E. Weaver	B190/	Email correspondence to team regarding powerpoint slide deck.	0.20
09/02/2023	D. Harlan	B190/	Perform document review.	8.60
09/03/2023	D. Harlan	B190/	Perform document review.	5.80
09/04/2023	V. Driver	B160/	Call with N, Pattis about payment (.3); emails regarding payment to N. Pattis (.2).	0.50
09/04/2023	V. Driver	B190/	Emails on 2004 limits for AJ examination.	0.20
09/04/2023	D. Harlan	B190/	Perform document review.	4.30
09/05/2023	L. Dauphin	B190/	Access online repository and prepare third party productions for attorney discovery review.	1.20
09/05/2023	V. Driver	B190/	Review 2004 exam notice.	0.30
09/05/2023	V. Driver	B195/	Travel to Austin for deposition (billed at half time 3.0).	1.50

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney
Vickie L. Driver

Post - petition

09/05/2023	D. Harlan	B190/	Perform document review.	1.60
09/05/2023	D. Harlan	B190/	Redact documents for document review.	3.20
09/05/2023	J. Yoon	B190/	Email UCC's counsel regarding Rule 2004 deposition transcripts of Patrick Riley.	0.20
09/06/2023	L. Dauphin	B190/	Prepare third party productions received from Akin and Scott Douglas for attorney review.	1.30
09/06/2023	V. Driver	B120/	Emails seeking clarification on 2017 watch report to current valuepro's appraisal.	0.30
09/06/2023	V. Driver	B140/	Continuation of emails on rescheduling Texas trial.	0.20
09/06/2023	V. Driver	B160/	Circulating interim monthly fee statements.	0.10
09/06/2023	V. Driver	B190/	Preparation for and attend E. Jones 2004 examination (7.4); discuss examination with client (.6); emails regarding review protocol for texts (.2).	8.20
09/06/2023	V. Driver	B210/	Emails regarding issues on budget.	0.40
09/06/2023	D. Harlan	B190/	Perform document review.	8.60
09/06/2023	K. Kinser	B190/	Perform document review.	7.30
09/06/2023	C. Stephenson	B110/	Draft response to press inquiry.	1.20
09/06/2023	C. Stephenson	B190/	Review and respond to personal property inquiry from creditor.	0.70

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/06/2023	E. Weaver	B110/	Procure appraisal report and premarital agreement and circulate to team.	0.20
09/06/2023	E. Weaver	B110/	Electronic case file management.	2.20
09/06/2023	E. Weaver	B190/	Review the UCC's notice of rescheduled rule 2004 deposition of Joseph Dalessio and continuance of rule 2004 deposition of David Jones and docket same.	0.40
09/07/2023	L. Dauphin	B190/	Continue to prepare third party productions received from Akin for attorney review.	3.50
09/07/2023	V. Driver	B110/	Meeting with client regarding various case status issues.	1.00
09/07/2023	V. Driver	B190/	Emails with group regarding logistics for AJ 2004 examination.	0.20
09/07/2023	V. Driver	B190/	Emails with N. Pattis on payment owed and status of appeal.	0.40
09/07/2023	V. Driver	B195/	Travel from Austin home (billed at half time 3.0).	1.50
09/07/2023	D. Harlan	B190/	Research privilege issues.	1.60
09/07/2023	D. Harlan	B190/	Perform document review.	7.30
09/07/2023	K. Kinser	B190/	Perform document review.	3.20
09/07/2023	C. Stephenson	B320/	Perform and analyze research for plan of reorganization.	3.80

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/07/2023	E. Weaver	B190/	Review the UCC's notice of continued rule 2004 deposition of David Jones and the Texas Plaintiff's amended notice of 2004 deposition of David Jones and docket same (.2); review the UCC's notice of postponed 2004 examination of Robert Schleizer and docket same (.1).	0.30
09/08/2023	L. Dauphin	B190/	Prepare supplemental document production.	0.90
09/08/2023	V. Driver	B190/	Call with L. Dauphin on document production issues (.3); review documents for production (.8); emails with UCC on document production status (.2).	1.30
09/08/2023	D. Harlan	B190/	Perform document review.	6.80
09/08/2023	D. Harlan	B190/	Work on privilege memo.	0.70
09/08/2023	K. Kinser	B190/	Perform document review.	7.40
09/08/2023	C. Stephenson	B320/	Perform and analyze research regarding disposable income issue for plan of reorganization (2.2); draft related correspondence (.8).	3.00
09/09/2023	D. Harlan	B190/	Perform document review.	9.80
09/10/2023	V. Driver	B190/	Call with UCC on examination issues.	0.40

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/10/2023	V. Driver	B195/	Travel to Austin for 2004 exam preparation (billed at half time 3.0).	1.50
09/10/2023	D. Harlan	B190/	Perform document review.	11.60
09/11/2023	V. Driver	B110/	Meet with client regarding ROR response structure and references (1.3); meeting with S. Jordan discussing response to ROR (.4).	1.70
09/11/2023	V. Driver	B110/	Meetings with client on general case status.	0.90
09/11/2023	V. Driver	B190/	Meeting(s) with client to prepare for 2004 examination.	5.70
09/11/2023	V. Driver	B190/	Preparation for 2004 examination.	2.10
09/11/2023	V. Driver	B190/	Address questions related to document review and privilege issues.	0.60
09/11/2023	D. Harlan	B190/	Perform document review.	9.60
09/11/2023	K. Kinser	B110/	Perform document review.	2.00
09/11/2023	C. Stephenson	B190/	Client meeting for deposition prep (2.2); meeting with financial advisor regarding same (1.1); additional deposition preparation (1.6).	4.90
09/11/2023	C. Stephenson	B195/	Travel to Austin for client deposition billed at half-time (4.0).	2.00
09/11/2023	E. Weaver	B110/	Review and revise list of upcoming deadlines.	0.60

Jones, Alex "AJ"

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Client # 50134

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Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/11/2023	E. Weaver	B190/	Attention to letter from Gus Oppermann requesting supplemental clerk's record to be filed with the court of appeals in state court action pending in Travis County and circulate same to team.	0.20
09/12/2023	L. Dauphin	B190/	Create additional document assignment groups.	0.10
09/12/2023	V. Driver	B140/	Emails regarding lift stay extension with Texas plaintiffs.	0.20
09/12/2023	V. Driver	B185/	Emails regarding ESG issues, potential resolution.	0.90
09/12/2023	V. Driver	B190/	Meet with client to prepare for second half of 2004 exam.	1.10
09/12/2023	V. Driver	B190/	Preparation for and attend 2004 exam of client.	5.10
09/12/2023	K. Kinser	B190/	Perform document review.	1.70
09/12/2023	C. Stephenson	B190/	Attend deposition of A. Jones and related client meetings (5.2); draft and revise response to reservation of rights (2.4).	7.60
09/12/2023	E. Weaver	B110/	Compile upcoming dates and deadlines (.3); email correspondence to Bob Schleizer with upcoming 2004 deposition dates and hearings (.2).	0.50
09/12/2023	E. Weaver	B160/	Review updated spreadsheet received from Blackbriar Advisors and revise seventh monthly fee statement to include August time.	1.40

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/13/2023	V. Driver	B140/	Discuss extension of trial to accommodate pretrial extension with Texas counsel.	0.40
09/13/2023	V. Driver	B190/	Meeting with Sub V trustee and client.	1.40
09/13/2023	V. Driver	B190/	Attend 2004 examination and preparation before (4.9); meetings with client following 2004 exam (.9).	5.80
09/13/2023	V. Driver	B210/	Meet with T. Wolff on bourbon contract and have same executed and sent to SubV Trustee and FSS. (.7) Meeting with UCC following 2004 exam. (.5)	1.20
09/13/2023	D. Harlan	B190/	Perform document review.	7.80
09/13/2023	K. Kinser	B190/	Perform document review.	6.30
09/13/2023	C. Stephenson	B190/	Draft and revise response to Reservation of Rights (4.3); review and respond to related correspondence (1.3).	5.60
09/13/2023	E. Weaver	B160/	Draft professional fee statement spreadsheet.	4.20
09/14/2023	V. Driver	B110/	Review and revise ROR response (1.5); calls with client finalizing ROR response (.6).	2.10
09/14/2023	V. Driver	B185/	Work to finalize ESG settlement.	0.80
09/14/2023	V. Driver	B195/	Travel to Dallas from Austin (3.6 - billed at half-time).	1.80

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

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Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/14/2023	V. Driver	B210/	Emails extending objection deadlines on admin claim and employee motion.	0.20
09/14/2023	D. Harlan	B120/	Perform asset recovery research.	7.60
09/14/2023	D. Harlan	B190/	Perform document review.	2.40
09/14/2023	C. Stephenson	B195/	Travel from Austin to Dallas (billed at half-time).	2.00
09/14/2023	E. Weaver	B160/	Revise professional fee statement spreadsheet (3.5); email correspondence to Shelby Jordan's office and Rachel Kennerly's office to confirm initial retainer received (.3).	3.80
09/14/2023	E. Weaver	B190/	Review agreed order on motion for approval of compromise and settlement and docket date consensual agreement due and date automatic shall lift to allow pre-trial proceedings.	0.40
09/14/2023	E. Weaver	B190/	Review notice of relocated deposition of Joseph Dalessio and docket same.	0.20
09/15/2023	L. Dauphin	B190/	Prepare discovery for attorney production review.	1.20
09/15/2023	V. Driver	B120/	Analyze issues relating to estate assets for individuals in Bankruptcy.	1.10
09/15/2023	V. Driver	B190/	Emails scheduling meeting with Sub V trustee.	0.30
09/15/2023	V. Driver	B190/	Emails regarding resetting R. Schleizer deposition.	0.30

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/15/2023	V. Driver	B210/	Emails and calls related to ESG settlement.	1.10
09/15/2023	D. Harlan	B120/	Draft asset recovery memo.	9.50
09/15/2023	D. Harlan	B190/	Perform document review.	2.60
09/15/2023	K. Kinser	B190/	Correspondence regarding production.	0.10
09/15/2023	C. Stephenson	B190/	Review and analyze research regarding contested budget issues (1.6); draft and review related correspondence (1.3).	2.90
09/15/2023	E. Weaver	B160/	Revise, finalize and file seventh monthly fee statement for BlackBriar Advisors (.6); serve same via email to the notice parties (.2).	0.80
09/16/2023	D. Harlan	B190/	Perform document review.	11.20
09/17/2023	D. Harlan	B190/	Perform document review.	11.40
09/18/2023	V. Driver	B185/	Review and revise release on ESG and send to group for review (.4); review and analyze stipulation incorporating release terms and approve same (.3); emails and calls seeking approval of ESG stipulation for filing (.4).	1.10
09/18/2023	V. Driver	B190/	Review and revise ROR response and prepare for filing (1.6); communication with client regarding same (.2).	1.80
09/18/2023	D. Harlan	B120/	Work on asset recovery memo.	2.60

Jones, Alex "AJ"

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October 31, 2023Client # 50134
Matter # 00802Invoice # 765083
Responsible Attorney
Vickie L. Driver

Post - petition

09/18/2023	D. Harlan	B130/	Proof, edit and fix cities on sale motion.	1.60
09/18/2023	D. Harlan	B190/	Perform document review.	7.40
09/18/2023	C. Stephenson	B190/	Review and respond to Youngevity counsel regarding 2004 production.	0.80
09/18/2023	C. Stephenson	B190/	Draft and revise Response and Objection to Reservation of Rights (2.8); review and respond to related correspondence (.8).	3.60
09/18/2023	C. Stephenson	B210/	Draft joint mutual release document.	1.70
09/18/2023	E. Weaver	B110/	Review spreadsheet received from BlackBriar Advisors and draft August monthly operating report (2.0); telephone call with Bob Schleizer and Kathy Norderhaug regarding professional fee schedule (.2).	2.20
09/18/2023	E. Weaver	B190/	Review email communications from Eric Awerbuch with Emord & Associates regarding Youngevity's written response and responsive documents to 2004 request (.2); forward fileshare link to Eric to share documents (.2); telephone call with Eric regarding access (.1); upload same to Litshare and Everlaw (.5).	1.00
09/19/2023	V. Driver	B110/	Review and respond to press inquiry.	0.30

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/19/2023	V. Driver	B120/	Analyze issues with press coverage and misstatement of liability.	0.30
09/19/2023	V. Driver	B190/	Attend deposition of Joey DeLassio.	2.00
09/19/2023	V. Driver	B210/	Review and approve changes to stipulation with ESG on Platinum monies.	0.30
09/19/2023	D. Harlan	B190/	Perform document review.	5.60
09/19/2023	D. Harlan	B190/	Perform text document review.	9.50
09/19/2023	C. Stephenson	B120/	Draft correspondence regarding potential claims.	1.30
09/19/2023	C. Stephenson	B185/	Perform analysis and review correspondence regarding ESG contract issues.	1.70
09/19/2023	E. Weaver	B110/	Revise, finalize and file August monthly operating report.	2.00
09/19/2023	E. Weaver	B160/	Draft July monthly fee statement for Rachel Kennerly.	1.00
09/20/2023	D. Harlan	B120/	Draft asset recovery memo.	3.50
09/20/2023	D. Harlan	B190/	Perform document review.	9.40
09/20/2023	C. Stephenson	B190/	Review and respond to research correspondence regarding various contested matters.	1.30
09/20/2023	C. Stephenson	B210/	Review and revise stipulation (.6); review and draft related correspondence (1.6).	2.20

Jones, Alex "AJ"

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October 31, 2023

Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/20/2023	E. Weaver	B160/	Revise, finalize and file third monthly fee statement for Rachel Kennerly (1.0); serve same via email to the notice parties (.2).	1.20
09/20/2023	E. Weaver	B210/	Revise and finalize joint stipulation and agreed order resolving distribution of Platinum Products sales proceeds and file in both the AEJ and FSS cases.	1.40
09/21/2023	V. Driver	B210/	Calls and emails with FSS counsel, Sub V Trustee, FSS controller, and client on FSS' DIP account closure and resolving same (2.2); calls and emails with CLO for Axos Bank on reopening accounts (.7); review and revise motion for sanctions for willful violation of the stay and order granting same (.8); call and email with court seeking time for emergency hearing and informing them of resolution of issue (.4).	4.10
09/21/2023	D. Harlan	B120/	Draft asset recovery memo.	5.30
09/21/2023	D. Harlan	B190/	Perform document review.	0.60
09/21/2023	D. Harlan	B190/	Finishing doc review for leftover trust docs.	0.10
09/21/2023	D. Harlan	B210/	Obtaining contact information for executives of Axis Bank to forward potential motion.	0.10

Jones, Alex "AJ"

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Client # 50134

Invoice # 765083

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/21/2023	C. Stephenson	B110/	Review and respond to media inquiry.	0.90
09/21/2023	C. Stephenson	B210/	Draft Emergency Motion to Enforce the Automatic Stay regarding Axios Bank (1.7); draft proposed order regarding same (.5).	2.20
09/21/2023	E. Weaver	B210/	Revise joint emergency motion to enforce the automatic stay and request for damages for willful stay violations in FSS case.	1.00
09/22/2023	V. Driver	B190/	Preparation for call with UCC on outstanding discovery issues (.7); attend call with UCC counsel on discovery issues (.8).	1.50
09/22/2023	V. Driver	B210/	Emails with co-counsel on employment contract and admin claim.	0.80
09/22/2023	D. Harlan	B190/	Discovery call with Vickie L. Driver and Akin Gump.	1.10
09/22/2023	D. Harlan	B190/	Perform document review.	5.70
09/22/2023	E. Weaver	B160/	Revise professional fee statement to include Martin, Disiere, the Reynal firm and Teneo Capital, LLC numbers.	2.80
09/25/2023	V. Driver	B190/	Emails on discovery follow ups and working to resolve same (.8); review and analyze further review documents and items in discovery (1.6).	2.40

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

09/25/2023	V. Driver	B210/	Emails seeking meetings to resolve FSS issues (.4); review 16th CCO and send comments to same (.4).	0.80
09/25/2023	D. Harlan	B120/	Draft MOR-related memo.	1.50
09/25/2023	E. Weaver	B160/	Revise professional fee statement spreadsheet.	3.10
09/25/2023	E. Weaver	B190/	Review the UCC's second notice of rule 2004 requests to Coinbase and docket deadline for same.	0.20
09/25/2023	E. Weaver	B230/	Review FSS's sixteenth interim cash collateral order and docket hearing date for same.	0.30
09/26/2023	V. Driver	B195/	Travel from Houston to Austin for client meeting (billed at half time 3.0).	1.50
09/26/2023	V. Driver	B210/	Preparation for and attend hearing on cash collateral for FSS and related case issues (1.2); meeting with FSS counsel on Axos bank issues and other DIP banks (.3); meeting with SubV Trustee and FSS on issues with plan revision and confirmation and employment agreement and admin claim (.8).	2.30
09/26/2023	V. Driver	B320/	Analyze issues with plan terms.	1.50
09/26/2023	D. Harlan	B110/	Review MORs.	0.40
09/26/2023	D. Harlan	B190/	Draft privilege log.	2.20

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

Post - petition

09/26/2023	D. Harlan	B190/	Draft Suggestion of Bankruptcy.	0.90
09/26/2023	D. Harlan	B195/	Travel to Austin to meet with Alex Jones and Vickie L. Driver (billed at half time - 4.6 hours).	2.30
09/26/2023	D. McClellan	B190/	Call to discuss status of adversary proceeding.	0.50
09/26/2023	E. Weaver	B160/	Review sixth monthly fee statement of Teneo Capital, LLC and docket objection deadline for same.	0.20
09/26/2023	E. Weaver	B190/	Coordinate with and various telephone calls and correspondence to Esquire to obtain Vol. 1 and 2 of the Alex Jones transcripts from his 2004 examination.	1.40
09/26/2023	E. Weaver	B230/	Review agenda for FSS's cash collateral hearing and circulate to team.	0.20
09/27/2023	V. Driver	B110/	Meetings with client to update on all case matters.	1.40
09/27/2023	V. Driver	B130/	Review and revise Motion to Sell Personal Property (.8); emails with committee on sale motion modifications (.6); review personal property to be sold (.3).	1.70
09/27/2023	V. Driver	B185/	Emails with UCC seeking hearing on motion to reject ESG.	0.40
09/27/2023	V. Driver	B190/	Work on document discovery issues (1.3); emails on deposition scheduling (.2).	1.50

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

Post - petition

09/27/2023	V. Driver	B210/	Review stipulation as filed and send to FSS for inclusion in Thursday AP run.	0.30
09/27/2023	V. Driver	B210/	Review and analyze UCC comments to employment agreement and admin claim motion and send response to FSS counsel (.8); discuss same with FSS counsel (.4); review and analyze budget expenditures and revenue (.7).	1.90
09/27/2023	D. Harlan	B110/	Meeting with client to update on all case matters.	0.80
09/27/2023	D. Harlan	B110/	Meeting with client and Blackbriar to update on case matters.	0.50
09/27/2023	D. Harlan	B190/	Draft Suggestion of Bankruptcy for FSS and review trust documents.	0.60
09/27/2023	D. Harlan	B190/	Draft privilege log.	0.60
09/27/2023	D. Harlan	B190/	Perform document review.	5.30
09/27/2023	E. Weaver	B160/	Email correspondence with Lori Hanes in Chris Martin's office regarding invoices/fee statements and retainer.	0.50
09/27/2023	E. Weaver	B185/	Review case docket for objections/responses to motion to reject executory contracts and circulate to team.	0.80
09/27/2023	E. Weaver	B310/	Review claims register and draft reconciliation spreadsheet against schedules.	4.20

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Responsible Attorney

Vickie L. Driver

Post - petition

09/28/2023	V. Driver	B110/	Calls with client on case.	0.60
09/28/2023	V. Driver	B185/	Emails with UCC counsel on setting ESG motion to reject for hearing.	0.20
09/28/2023	V. Driver	B190/	Review documents marked for further review (1.7); emails regarding document review on additional email account (.2); scheduling meeting with Sub V and client (.2).	2.10
09/28/2023	V. Driver	B195/	Travel from Austin (3.6 billed at half time).	1.80
09/28/2023	V. Driver	B210/	Meetings with client and BBA.	2.10
09/28/2023	D. Harlan	B190/	Reviewing MOR documents and creating chart.	2.50
09/28/2023	D. Harlan	B190/	Perform document review.	8.80
09/28/2023	D. Harlan	B195/	Travel from Austin to DFW (11:30 AM - 4:00 PM) (Billed at half time - 4.5 hrs).	2.20
09/28/2023	C. Stephenson	B160/	Review and revise billing statement (2.3); draft related correspondence (.6).	2.90
09/28/2023	C. Stephenson	B190/	Review and analyze deposition testimony (3.8); draft related correspondence (.8).	4.60
09/28/2023	E. Weaver	B190/	Review UCC's notice of rule 2004 requests to Binance and Krake and docket deadlines for same.	0.30
09/28/2023	E. Weaver	B310/	Review claims register and begin downloading claims.	2.40

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Responsible Attorney
Vickie L. Driver

Post - petition

09/29/2023	L. Dauphin	B190/	Apply payment to upgrade Proton email account (.2); prepare email collected by Digital Mountain for attorney production review (.1).	0.30
09/29/2023	L. Dauphin	B190/	Prepare supplemental client document production.	1.40
09/29/2023	V. Driver	B160/	Review and approve monthly fee statement for filing.	0.30
09/29/2023	V. Driver	B190/	Emails with UCC and team on discovery issues.	2.10
09/29/2023	V. Driver	B210/	Call and emails with L. Freeman on FSS issues (1.1); call with FSS counsel on same (.3).	1.40
09/29/2023	D. Harlan	B190/	Perform document review.	9.20
09/29/2023	D. Harlan	B190/	Draft Suggestion of Bankruptcy.	0.70
09/29/2023	C. McDonald	B190/	Review terms of AEJ 2018 Trust (.3); email correspondence (.6).	0.90
09/29/2023	C. Ottaway	B190/	Review 2018 trust (.2); discuss power of court order (.4).	0.60
09/29/2023	C. Stephenson	B160/	Draft and revise Eighth Statement of Interim Compensation (1.7); review spreadsheet data (1.3); draft exhibits to same (1.8); file and serve statement (.8).	5.60
09/29/2023	J. Yoon	B190/	Analyze and review Youngevity's objections and responses to debtor's request for production under rule 2004 (1.5); draft email analysis of the same for discovery issues (1.2).	2.70

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Responsible Attorney

Vickie L. Driver

Post - petition

09/30/2023	V. Driver	B110/	Calls with client on current issues in case and budgeting.	0.80
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09/30/2023	D. Harlan	B190/	Perform document review.	8.30
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Total Hours	490.60
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Total Fees for this Invoice

\$213,291.00

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	22.80	12,212.50	Bankruptcy - Case Administration
B120	33.00	10,681.00	Bankruptcy - Asset Analysis and Recovery
B130	3.30	1,799.50	Bankruptcy - Asset Disposition
B140	1.10	874.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B160	31.50	13,312.50	Bankruptcy - Fee/Employment Applications
B185	5.90	4,154.50	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	333.60	131,504.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	18.10	11,752.00	Bankruptcy - Non-Working Travel
B210	25.90	18,851.00	Bankruptcy - Business Operations

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B230	0.50	147.50	Bankruptcy - Financing/Cash Collections
B310	6.60	1,947.00	Bankruptcy - Claims Administration and Objections
B320	8.30	6,054.50	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	490.60	\$213,291.00	

09/05/2023	McClellan, Deric reimbursement of travel expenses to Houston Texas to attend Motion for Summary Judgment Hearing regarding Alex Jones 8/13-16/2023; transportation \$ 663.83, lodging \$ 817.33 and meals \$ 86.29	\$1,567.45
09/05/2023	Davis , Chris reimbursement of travel expenses to Houston Texas to attend Motion for Summary Judgment Hearing regarding Alex Jones 8/13-16/2023; 980 miles x .655/mile= \$ 641.90, lodging \$ 1383.24, conference room \$ 500.00, tolls \$ 26.00, valet and hotel tips \$ 60.00 and meals 212.41	2,849.55
09/07/2023	Payment to Special Delivery Service for professional services rendered regarding invoice 699478	341.00
09/12/2023	Texas Secretary of State Online Charge 8/1-31/2023	1.00
09/14/2023	Stephenson, Christina reimbursement of travel expenses to Austin Texas for depositions 9/10-14/2023; transportation \$ 149.45 and meals \$ 104.12	253.57
Subtotal of Expenses		\$5,012.57
Subtotal of Costs		\$0.00
Total Expenses and Costs for this Invoice		\$5,012.57

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E110	4,670.57	Out-of-town travel
E112	1.00	Court fees
E123	341.00	Other professionals
Total	<u>\$5,012.57</u>	

Total For This Invoice

\$218,303.57

SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
C. Ottaway	0.60	525.00	315.00
L. Dauphin	9.90	185.00	1,831.50
D. McClellan	0.50	310.00	155.00
K. Kinser	36.80	285.00	10,488.00
V. Driver	94.50	795.00	75,127.50
C. Stephenson	62.50	715.00	44,687.50
E. Weaver	44.70	295.00	13,186.50
C. McDonald	0.90	255.00	229.50
J. Yoon	2.90	285.00	826.50
D. Harlan	237.30	280.00	66,444.00
Total	<u>490.60</u>		<u>\$213,291.00</u>

EXHIBIT “F”

Tenth Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**TENTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
OCTOBER 1, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	10/01/2023	11/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$406,582.40 ¹ (80% of \$508,228.00)	
Total Reimbursable Expenses Requested in this Statement:	\$31,127.75 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$483,174.50	
Total Actual Attorneys Hours Covered by this Statement:	1025.6	
Average Hourly Rate for Attorneys:	\$471.11	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$25,053.50	
Total Actual Paraprofessional Hours Covered by this Statement:	88.2	
Average Hourly Rate for Paraprofessionals:	\$284.05	

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Tenth Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from October 1, 2023 through November 30, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$406,582.40 (80% of \$508,228.00) as compensation for professional services rendered to the Debtor during the period from October 1, 2023 through November 30, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$31,127.75, for a total amount of \$437,710.15 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$508,228.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$31,127.75 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$437,710.15 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX
Dated: December 21, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 737.218.6187
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on December 21, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	19,996.59
Online Research	1.20
Court Fees	596.00
Delivery Services/Messengers	101.72
Litigation Support Vendors	9,945.00
Outside Printing	182.25
Other Professionals	304.99

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	53.8	23.7
B120 Asset Analysis and Recovery	8.9	0.00
B130 Asset Disposition	12.2	2.5
B140 Relief from Stay/Adequate Protection	0.3	0.00
B150 Meetings of & Communications with Creditors	3.1	0.0
B160 Fee/Employment Applications	44.1	30.7
B170 Fee/Employment Objections	1.4	8.2
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	5.8	5.9
B190 Other Contested Matters	632.1	26.4
B195 Non-Working Travel	38.5	0.00
B210 Business Operations	42.4	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	1.7	0.00
B240 Tax Issues	30.5	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	10.4	2.2
B320 Plan and Disclosure Statement	140.4	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	1025.6	99.6

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

November 30, 2023
Invoice # 768639

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$508,228.00
Current Invoice Total Expenses	<u>\$31,127.75</u>
Current Invoice Total	<u>\$539,355.75</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 768639 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

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November 30, 2023

Client # 50134

Invoice # 768639

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF PREVIOUS UNPAID INVOICES

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Amount Billed</u>	<u>Credits Applied</u>	<u>Balance Due</u>
761699	06/30/2023	341,921.51	-31,548.08	310,373.43
761700	07/31/2023	214,254.82	0.00	214,254.82
761722	08/31/2023	493,188.66	0.00	493,188.66
763441	09/29/2023	320,869.84	0.00	320,869.84
765083	10/31/2023	218,303.57	0.00	218,303.57
TOTALS:		<u>\$1,588,538.40</u>	<u>\$-31,548.08</u>	<u>\$1,556,990.32</u>

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Invoice # 768639

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

09/01/2023	V. Driver	B195/	Travel from Austin home (billed at half time 3.0).	1.50
09/14/2023	V. Driver	B195/	Travel home (billed at half time 3.0).	1.50
10/01/2023	V. Driver	B195/	Travel to Austin for deposition (billed at half time 3.0)	1.50
10/01/2023	D. Harlan	B190/	Perform research and analysis regarding Texas trust law.	0.80
10/01/2023	D. Harlan	B190/	Perform document review.	10.30
10/02/2023	L. Dauphin	B190/	Perform tasks for document review.	0.10
10/02/2023	V. Driver	B210/	Call with FSS counsel on book signing issues (.4); call with client on FSS operations and book sale details (1.1).	1.50
10/02/2023	V. Driver	B310/	Calls with FSS counsel on admin claim issues (.4); calls with SubV trustee's counsel regarding admin claim (.6); analyze strategy regarding admin claim issues (1.3).	2.30
10/02/2023	D. Harlan	B190/	Research and analyze privilege issues	0.50
10/02/2023	D. Harlan	B190/	Perform analysis regarding deposition and related transcript.	4.60
10/02/2023	D. Harlan	B320/	Perform and analyze research regarding plan issues.	4.30

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

10/02/2023	C. McDonald	B120/	Draft correspondence regarding spendthrift provisions in AEJ 2018 trust (.2); trust review regarding same (.2).	0.40
10/02/2023	C. Stephenson	B120/	Review and analyze correspondence regarding trust issues (1.4); review related research memo (.8).	2.20
10/02/2023	C. Stephenson	B190/	Review and respond to correspondence regarding Debtor 2004 exam issues.	0.80
10/02/2023	C. Stephenson	B190/	Review Debtor deposition and analyze issues regarding same.	2.70
10/02/2023	C. Stephenson	B310/	Review and analyze Response to Application for Administrative Expenses.	0.80
10/03/2023	V. Driver	B190/	Attend Dr. Jones 2004 examination.	5.30
10/03/2023	V. Driver	B210/	Emails with Committee counsel on employment agreement resolution (.4); analyze research issues with book signing and send emails to FSS counsel on same (.8); review and revise stipulation resolving employment Agreement and send to SubV Trustee and FSS counsel with explanatory email and preview same with Sub V Trustee (1.1).	2.30

Jones, Alex "AJ"

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Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

10/03/2023	V. Driver	B310/	Review objection to admin claim (.7); analyze and develop issues needed to address in reply; (.8) email to Sub V Trustee and FSS counsel on issues with admin claim objection (.6); call with TX counsel on admin claim (.5).	2.60
10/03/2023	V. Driver	B320/	Emails and calls discussing exit strategies for Debtor.	2.30
10/03/2023	D. Harlan	B190/	Printing, arranging, and marking up deposition transcripts	0.70
10/03/2023	D. Harlan	B190/	Prepare new discovery production.	2.20
10/03/2023	D. Harlan	B210/	Westlaw research and communications re autopen.	1.10
10/03/2023	D. Harlan	B210/	Perform discovery and interrogatory requests regarding employment agreement.	5.80
10/03/2023	D. Harlan	B230/	Review cash collateral orders.	0.50
10/03/2023	C. Stephenson	B110/	Attend conference call with multiple parties in interest regarding various case matters and discussion of same.	1.30
10/03/2023	C. Stephenson	B185/	Review and revise Stipulation regarding Motion to Reject Contract.	1.70
10/03/2023	C. Stephenson	B310/	Draft Reply to Response to Administrative Expense Application.	0.80
10/04/2023	V. Driver	B190/	Meeting with Sub V Trustee and counsel on outstanding issues.	3.20

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Responsible Attorney
Vickie L. Driver

Post - petition

10/04/2023	V. Driver	B195/	Travel from Austin home (billed at half time 3.0).	1.50
10/04/2023	V. Driver	B195/	Travel from Austin to Dallas (billed at half time 3.2) 1.6	1.60
10/04/2023	V. Driver	B310/	Meeting with FSS and client on admin claim and other case resolutions.	3.90
10/04/2023	D. Harlan	B110/	Attend meeting with Sub V trustee.	1.60
10/04/2023	D. Harlan	B190/	Perform document review.	4.80
10/04/2023	D. Harlan	B210/	Prepare draft agreement for Jones' salary.	0.30
10/04/2023	E. Weaver	B110/	Draft amended Schedule G, Executory Contracts to include Mint Studios.	0.80
10/04/2023	E. Weaver	B110/	Review and respond to correspondence regarding reports.	0.30
10/04/2023	E. Weaver	B130/	Draft schedule of identified personal property to attach to the sale motion.	2.00
10/05/2023	V. Driver	B110/	Call with client on overall case strategy and issues.	0.50
10/05/2023	V. Driver	B130/	Emails and calls on asset sale listing, valuations and grounds for same and notice procedures on same.	1.10
10/05/2023	V. Driver	B210/	Call with client on meetings with CRO for FSS and proposed resolutions to certain contested issues.	0.70

Jones, Alex "AJ"

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Vickie L. Driver

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10/05/2023	D. Harlan	B190/	Perform document review.	7.50
10/06/2023	V. Driver	B130/	Call analyze asset listing and support for same.	0.90
10/06/2023	V. Driver	B190/	Call with client discussing multiple issues (.5); emails regarding deposition (.3); emails regarding UCC requests for valuation of PQPR (.2).	1.00
10/06/2023	V. Driver	B210/	Call with client discussing resolutions to FSS operational issues (.6); call with counsel for FSS regarding same (.8); correspondence regarding same (.8).	2.20
10/06/2023	V. Driver	B320/	Call with Committee and Plaintiff's counsel regarding case resolution matters.	1.60
10/06/2023	D. Harlan	B190/	Prepare file for R.. Schleizer's deposition preparation.	3.80
10/06/2023	D. Harlan	B190/	Work on doc review	7.10
10/06/2023	D. McClellan	B190/	Review and analyze court's orders on dischargeability	1.90
10/06/2023	D. McClellan	B190/	Develop strategy with dischargeability team.	2.50
10/06/2023	D. McClellan	B190/	Review and analyze research regarding appeal issues.	1.90
10/06/2023	C. Stephenson	B190/	Review and respond to correspondence regarding deposition matters for A. Jones.	1.30

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Responsible Attorney
Vickie L. Driver

Post - petition

10/06/2023	E. Weaver	B130/	Telephone call with BlackBriar Advisors regarding asset list and appraisals for sale motion.	0.50
10/06/2023	E. Weaver	B190/	Compile exhibits to AJ deposition.	0.50
10/06/2023	E. Weaver	B310/	Review claims register and continue downloading claims.	1.20
10/07/2023	D. Harlan	B190/	Perform document review.	7.60
10/08/2023	V. Driver	B130/	Provide asset listing with values for sale order to UCC.	0.40
10/08/2023	V. Driver	B210/	Calls with client regarding issues with FSS and whiskey deal (.8); research and send whiskey contract to FSS counsel confirming split (.6).	1.20
10/08/2023	D. Harlan	B190/	Perform document review.	8.10
10/09/2023	N. Collins	B240/	Communicate with CPA regarding calculation basis, holding period, gain or loss and other tax attributes upon disposition of certain in-kind property.	1.30
10/09/2023	L. Dauphin	B190/	Prepare supplemental client document production.	1.00
10/09/2023	V. Driver	B120/	Draft correspondence regarding homestead exemption issues.	0.20
10/09/2023	V. Driver	B130/	Draft correspondence regarding asset listing issues with UCC and BBA.	0.30

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

Post - petition

10/09/2023	V. Driver	B160/	Review messages from client on bill review issues (.2); sending Reynal statements for inclusion in reporting for client (.2); review fee statements from UCC counsel and emails regarding same. (.4).	0.80
10/09/2023	V. Driver	B190/	Call with E. Taube on document from Dr. Jones' deposition (.4); emails with UCC regarding same (.3); send to Dr. Jones' counsel for review (.2).	0.90
10/09/2023	V. Driver	B210/	Review and respond to correspondence from parties seeking meeting to discuss plan confirmation and operational issues (.4); call with FSS counsel on same (.8); call with financial advisors on same (.9; calls with client regarding same (.4); review correspondence regarding MugClub income (.2); draft correspondence regarding Red balloon executed contract to FSS counsel for approval by court (.2).	1.20
10/09/2023	D. Harlan	B160/	Draft N. Pattis's second motion for appointment as special counsel.	3.80
10/09/2023	D. Harlan	B190/	Perform document review.	5.10
10/09/2023	D. Harlan	B190/	Perform document review.	0.50

Jones, Alex "AJ"

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Vickie L. Driver

Post - petition

10/09/2023	D. Harlan	B190/	Perform document review.	1.60
10/09/2023	D. Harlan	B210/	Review and analyze research regarding security expenses.	0.30
10/09/2023	E. Weaver	B110/	Procure executed trust agreement for the homestead and circulate to team and John Lammert.	0.30
10/09/2023	E. Weaver	B160/	Prepare professional fee notebooks for all professionals in the case for review by client and financial advisors.	6.00
10/10/2023	N. Collins	B240/	Evaluate federal income tax reporting requirements of gratuitous transfers to debtor or debtor-related entities (1.1); communicate with CPA and outside advisors regarding tax reporting with respect to such transfers (.8)	1.90
10/10/2023	V. Driver	B190/	Call with UCC On discovery issues (1.1); follow up on same (.2); call with various parties in pending litigation and discovery requests from UCC (.8).	2.10
10/10/2023	V. Driver	B320/	Analyzing plan structure issues.	1.40
10/10/2023	D. Harlan	B150/	Discovery call with UCC.	0.50
10/10/2023	D. Harlan	B190/	Perform research and analysis.	1.50
10/10/2023	D. Harlan	B190/	Perform document review.	4.30

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Responsible Attorney

Vickie L. Driver

Post - petition

10/10/2023	E. Weaver	B160/	Email correspondence to and from The Reynal Law Firm regarding invoices since employment date (.2); compile all invoices, prepare a summary of same and circulate to team (.6).	0.80
10/11/2023	V. Driver	B120/	Analyze declination letter from appraisal district on homestead application (.2); correspondence with tax protester on same (.2); seek notarizing trust document (.4); calls with D. Minton and office on same (.8).	1.60
10/11/2023	V. Driver	B160/	Review and revise second application to employ Pattis for ancillary matters (.9); Messages with A. Reynal on potential engagement on Texas ancillary issues and terms of same (.6); Correspond with client on same (.3)	1.80
10/11/2023	D. Harlan	B160/	Edit Pattis second employment application and draft declaration.	2.80
10/11/2023	D. Harlan	B160/	Finalize Pattis declaration, application and order.	0.80
10/11/2023	D. Harlan	B190/	Call re Proton production	0.10
10/11/2023	D. Harlan	B190/	Draft correspondence regarding Taube document.	0.30
10/11/2023	D. Harlan	B190/	Draft email re ROGs	0.10

Jones, Alex "AJ"

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Vickie L. Driver

Post - petition

10/11/2023	D. Harlan	B190/	Perform document review.	3.00
10/12/2023	N. Collins	B240/	Analyze transaction records substantiating basis of in-kind property for 2022 federal tax reporting (4.7); communicate with CPA and outside advisors regarding basis records for debtor (1.2)	5.90
10/12/2023	N. Collins	B240/	Perform analysis regarding Bitcoin transaction.	1.00
10/12/2023	V. Driver	B160/	Review and analyze submission of Martin and Reynal monthly fee statements for calculation of AJ post-petition liability for approved fees and expenses (.7).	0.70
10/12/2023	V. Driver	B210/	Meeting with financial advisors on professional fee budgeting (.8); review emails on book revenue issues, shipment status, and pre-sale status (.3); review book revenue on royalties and email (.2); preparation for meeting with FSS on operational issues (.7).	2.00
10/12/2023	V. Driver	B240/	Calls with tax counsel and reviewing crypto basis research and analysis for reporting requirement compliance (.9); email to committee on issue with filing tax return promptly (.1).	1.00
10/12/2023	D. Harlan	B160/	Final review of Pattis app and declaration.	1.20

Jones, Alex "AJ"

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Vickie L. Driver

Post - petition

10/12/2023	D. Harlan	B190/	Perform document review.	2.40
10/12/2023	E. Weaver	B160/	Compile Akin Gump fee statements and circulate to BlackBriar Advisors and team.	0.20
10/12/2023	E. Weaver	B190/	Review joint notice regarding agreed order on compromise and settlement and docket dates and deadlines related to same.	0.30
10/13/2023	N. Collins	B240/	Perform analysis regarding Bitcoin transaction.	1.00
10/13/2023	N. Collins	B240/	Draft memorandum regarding IRS rules relating to the calculation gain or loss on dispositions of in-kind property (3.8); communicate with the CPA and outside advisors regarding supporting documentation for federal income tax purposes (1.9)	5.80
10/13/2023	V. Driver	B130/	Calls with client to discuss sale of real property.	1.10
10/13/2023	V. Driver	B195/	Travel from Austin. (half time 3.4)	1.70
10/13/2023	V. Driver	B210/	All hands meeting with Sub V Trustee and counsel, FSS and counsel, BBA and client on exit strategies and operational issue discussions (2.4); calls with FSS counsel on related operational issues and offers (.9)	3.30

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

10/13/2023	V. Driver	B240/	Call with tax counsel regarding updates on crypto taxation and basis research and updating team on same.	0.70
10/13/2023	V. Driver	B320/	Meeting with SubV trustee and counsel to discuss plan strategies.	1.50
10/13/2023	D. Harlan	B190/	Perform document review.	0.50
10/13/2023	C. Stephenson	B110/	Prepare for and attend all hands case meeting to discuss various case matters.	3.60
10/13/2023	C. Stephenson	B195/	Travel from Austin to Dallas (4.0 billed at half time).	2.00
10/13/2023	J. Yoon	B240/	Email and call Travis County Attorneys' office regarding debtor-related entity and tax issues	0.40
10/14/2023	V. Driver	B130/	Calls with client discussing real property sales.	0.60
10/14/2023	D. Harlan	B190/	Perform document review.	3.00
10/15/2023	V. Driver	B160/	Calls to discuss legal and professional fee budget and meetings to discuss same.	0.40
10/15/2023	D. Harlan	B190/	Perform document review.	2.90
10/16/2023	L. Dauphin	B190/	Prepare supplemental client document production.	0.50
10/16/2023	V. Driver	B130/	Calls on client case and moving sale process forward (1.4); analyze agents to hire and process to sell real property (.6).	2.00

Jones, Alex "AJ"

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Vickie L. Driver

Post - petition

10/16/2023	D. Harlan	B160/	Work on motion to employ broker and accompanying order.	3.50
10/16/2023	D. Harlan	B190/	Perform document review.	7.30
10/16/2023	J. Yoon	B240/	Analyze and review pertinent pleadings and Travis County public records in preparation for call with Travis County Attorneys' Office (0.5); call with assistant Travis County attorney regarding the same (0.5); email Travis County attorney regarding Rule 11 agreement (0.3).	1.30
10/17/2023	N. Collins	B240/	Analyze documentation and local tax renditions of a debtor-related entity.	1.20
10/17/2023	V. Driver	B130/	Review and revise order on personal property sale.	0.40
10/17/2023	V. Driver	B160/	Review and preparing Pattis second application and declaration.	0.60
10/17/2023	V. Driver	B190/	Review interrogatories and send to person with knowledge of crypto information.	0.30
10/17/2023	D. Harlan	B110/	Draft case planning calendar.	2.10
10/17/2023	D. Harlan	B130/	Draft order for motion authorizing sale of personal property.	2.20
10/17/2023	D. Harlan	B160/	Draft secondary edits to Pattis employment application and accompanying declaration and order.	0.60
10/17/2023	D. Harlan	B160/	Finalize broker application.	1.10

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Responsible Attorney
Vickie L. Driver

Post - petition

10/17/2023	D. Harlan	B190/	Perform document review.	2.10
10/17/2023	C. Stephenson	B160/	Review and respond to correspondence regarding broker employment and property sales.	0.80
10/17/2023	E. Weaver	B110/	Review profit and loss summary/spreadsheet for FSS and circulate to team.	0.50
10/17/2023	J. Yoon	B240/	Analyze and review personal property tax issues with debtor-related entity, Austin Shiprock Publishing, LLC.	0.80
10/18/2023	L. Dauphin	B190/	Assist with identification of key email questioned by opposing counsel.	0.10
10/18/2023	V. Driver	B110/	Call with BBA regarding MOR disclosures (.7); Call with client on general status of case and related issues (.8).	1.50
10/18/2023	V. Driver	B130/	Call to discuss issues with potential asset sale.	0.70
10/18/2023	V. Driver	B160/	Call with N. Pattis on need to expand role regarding subpoenas in various jurisdictions (.4); review and revise app to expand powers and send to Pattis for review and completion of certain information needed to file (1.1); Emails regarding interim fees to be paid (.4).	1.90

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Responsible Attorney

Vickie L. Driver

Post - petition

10/18/2023	V. Driver	B190/	Review lengthy email from UCC seeking additional information and send to BBA regarding gathering information on same (.7); respond to same (.2); emails with co-counsel on timing of rulings (.2).	1.10
10/18/2023	V. Driver	B210/	Approve withdrawal of admin claim.	0.30
10/18/2023	D. Harlan	B160/	Finalize edits on Pattis employment application.	0.60
10/18/2023	D. Harlan	B190/	Perform document review.	11.30
10/18/2023	C. Stephenson	B110/	Prepare for all hands meeting (1.1); prepare claims analysis and plan information (1.8).	2.90
10/18/2023	E. Weaver	B110/	Electronic case file management.	0.50
10/18/2023	E. Weaver	B160/	Draft, finalize and file motion for withdrawal of allowance and payment of administrative expenses pursuant to 503(B)(1) in the FSS case.	1.20
10/18/2023	J. Yoon	B160/	Analyze and review local and judge-specific rules regarding fee applications in preparation to draft the same (0.6); analyze and review docket entries regarding debtor's professionals and status of fee statements and interim applications (1.4); draft and revise consolidated fee statements for debtor (.9).	2.90

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

Post - petition

10/19/2023	J. Davis	B190/	Receipt and review opinions/orders in adversary proceedings (1.3); brief discussions with trial team (.2).	1.50
10/19/2023	V. Driver	B110/	Call to review and analyze issue with pro fee disclosures on MOR.	0.50
10/19/2023	V. Driver	B190/	Initial review of MSJ rulings (1.1); calls to discuss rulings with client (1.3); discuss rulings with trial team and potential next steps (1.1); review and respond to bank statement issues with UCC counsel (.2).	3.70
10/19/2023	V. Driver	B230/	Call with potential purchaser and Sub V trustee and FSS.	0.80
10/19/2023	V. Driver	B320/	Plan strategy session to discuss individual plan research issues, structure, claims classification and various other issues (3.6); work on proposed calendar for confirmation (1.1).	4.70
10/19/2023	D. Harlan	B120/	Attend exit strategy meeting.	3.10
10/19/2023	D. Harlan	B190/	Perform document review.	5.40
10/19/2023	D. Harlan	B320/	Research and analyze case law regarding Debtor's estate.	1.90
10/19/2023	D. McClellan	B190/	Conference regarding court's orders on dischargeability.	0.40

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Responsible Attorney

Vickie L. Driver

Post - petition

10/19/2023	D. McClellan	B190/	Review and analyze court's Texas and Connecticut orders on dischargeability.	3.90
10/19/2023	C. Stephenson	B190/	Review opinions for dischargeability and analyze same (6.3); conference and correspondence regarding same (1.8).	8.10
10/19/2023	E. Weaver	B190/	Review memorandum decisions for both adversary cases and circulate to team.	0.30
10/19/2023	R. Yates	B190/	Review summary judgment order in Connecticut (1.0); analyze the same with Chris Davis and Deric J. McClellan (.6).	1.60
10/19/2023	J. Yoon	B190/	Analyze and review case law, statutes, and rules of federal procedures and bankruptcy procedures regarding appeal of adversary proceedings.	2.30
10/19/2023	J. Yoon	B320/	Analyze and review issues regarding plan confirmation and strategize regarding the same.	3.20
10/20/2023	J. Davis	B190/	Call with AJ personal counsel Shelby to review the Court's recent rulings and discuss issues for appeal.	1.00
10/20/2023	V. Driver	B160/	Review and analyze application to expand role of N. Pattis for subpoena work (.7); Call with N. Pattis regarding expanded role emergency resolution due to subpoena being withdrawn (.4).	1.10

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Vickie L. Driver

Post - petition

10/20/2023	V. Driver	B190/	Review and analyze interlocutory appeal issues and actions post-MSJ ruling (1.8); calls with client discussing MSJ ruling and plan of action following same (1.6); detailed review of MSJ rulings and exploring appellate options (1.7).	5.10
10/20/2023	V. Driver	B210/	Review and response to correspondence with FSS counsel regarding video game and book sale split terms and calls with BBA and client regarding same.	0.70
10/20/2023	D. Harlan	B160/	Draft edits to Pattis application.	0.90
10/20/2023	D. Harlan	B160/	Draft motion to expedite.	1.60
10/20/2023	D. Harlan	B190/	Draft email re appeals issue	0.30
10/20/2023	D. Harlan	B190/	Perform document review.	7.40
10/20/2023	C. Stephenson	B190/	Team call and emails regarding appeal issues.	2.30
10/20/2023	E. Weaver	B160/	Review spreadsheet received from BlackBriar Advisors and draft, finalize and file September monthly fee statement.	2.20
10/20/2023	R. Yates	B190/	Review summary judgment order in Texas litigation.	0.60

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Responsible Attorney
Vickie L. Driver

Post - petition

10/20/2023	R. Yates	B190/	Analyze arguments in order on summary judgment (1.0); develop legal strategy regarding the same (.9).	1.90
10/20/2023	R. Yates	B190/	Prepare for and attend meeting with Shelby Jordan	1.00
10/20/2023	J. Yoon	B190/	Email analysis regarding adversary proceeding appeal process	3.10
10/20/2023	J. Yoon	B240/	Exchange emails with Travis County Attorneys' Office regarding tax status	0.30
10/21/2023	V. Driver	B190/	Emails confirming deposition rescheduling.	0.20
10/21/2023	D. Harlan	B190/	Perform document review.	3.70
10/22/2023	V. Driver	B320/	Work on legal budget projections for plan projections.	0.60
10/22/2023	D. Harlan	B190/	Perform document review.	6.80
10/22/2023	C. Stephenson	B110/	Draft Work budget for all case matters.	3.20
10/23/2023	L. Dauphin	B190/	Search, identify and redact personal information related to minor children.	0.60
10/23/2023	V. Driver	B110/	Call with co-counsel to discuss case status and strategy.	0.70
10/23/2023	V. Driver	B190/	Meetings with client to discuss strategy with settlement and related issues (1.4); attend to discovery issues (.3).	1.70
10/23/2023	V. Driver	B195/	Travel to Austin (billed at half time 3.6)	1.80

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Vickie L. Driver

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10/23/2023	V. Driver	B320/	Meeting with client to discuss plan structures possible for individuals in Chapter 11 (1.2); review case law on individual 11's and develop plan strategies (2.3)	3.50
10/23/2023	V. Driver	B320/	Emails with professional seeking budgets for financial projections (.3); review and analyze financial projections (.8).	1.10
10/23/2023	D. Harlan	B110/	Attend client meeting.	0.80
10/23/2023	D. Harlan	B110/	Research property of the estate issues.	1.10
10/23/2023	D. Harlan	B190/	Perform document review.	1.30
10/23/2023	D. Harlan	B195/	Travel to Austin, Texas (3.5). [Billed at half time]	1.70
10/23/2023	D. McClellan	B190/	Review and analyze rules of bankruptcy procedure and cases interpreting them to determine best route for interlocutory appeal of dischargeability orders	6.60
10/23/2023	C. Stephenson	B110/	Draft and revise budget (2.2); review and respond to related correspondence (1.1).	3.30
10/23/2023	C. Stephenson	B160/	Revise billing statement (1.4); draft related correspondence (.4).	1.80
10/23/2023	C. Stephenson	B320/	Perform analysis and draft correspondence regarding plan of reorganization.	3.80

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10/23/2023	E. Weaver	B110/	Prepare draft of third amended schedules (3.8); email correspondence to BlackBriar Advisors listing changes (.3).	4.10
10/23/2023	R. Yates	B190/	Formulate strategy for interlocutory appeal of summary judgment orders	0.50
10/23/2023	J. Yoon	B190/	Analyze and review issues regarding appeal in preparation to draft notices of appeal and motion for leave to appeal Texas and Connecticut interlocutory orders	2.50
10/23/2023	J. Yoon	B240/	Call with Travis County Appraisal District regarding potential tax issues	0.60
10/24/2023	V. Driver	B110/	Meetings with client on status of case (2.1); call with co – counsel on status of case and overall case strategy (.9)	3.00
10/24/2023	V. Driver	B130/	Call with potential purchaser of property,	0.80
10/24/2023	V. Driver	B190/	Work on discovery issues with document production and privilege log.	1.90
10/24/2023	V. Driver	B195/	Travel from Austin billed at half time of 3.6 (1.8)	1.80
10/24/2023	D. Harlan	B110/	Attend client meeting.	1.40
10/24/2023	D. Harlan	B130/	Draft final edits on personal property motion and order.	0.60
10/24/2023	D. Harlan	B150/	Draft correspondence to UCC.	0.80

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10/24/2023	D. Harlan	B160/	Work on real estate broker project.	0.90
10/24/2023	D. Harlan	B190/	Perform document review.	5.30
10/24/2023	D. McClellan	B190/	Review and analyze statutes and case for possible interlocutory appeal.	4.50
10/24/2023	D. McClellan	B190/	Develop strategy regarding potential appeal.	0.90
10/24/2023	C. Stephenson	B190/	Team call regarding dischargeability appellate issues.	1.30
10/24/2023	E. Weaver	B190/	Review the UCC's second rescheduled 2004 examination of R. Schleizer and docket same.	0.20
10/24/2023	R. Yates	B190/	Review summary judgment order in Connecticut case to identify "questions presented" for appellate purposes.	1.70
10/24/2023	R. Yates	B190/	Draft preliminary statement and factual background for motion for leave to appeal summary judgment order.	1.30
10/24/2023	R. Yates	B190/	Conduct legal research on bankruptcy appellate procedure for appeal of interlocutory order	0.70
10/24/2023	R. Yates	B190/	Create outline for motion for leave to appeal summary judgment order on dischargeability	0.50

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10/24/2023	R. Yates	B190/	Analyze options for interlocutory appeal of summary judgment order (.3); conduct legal research on the same (.8).	1.10
10/24/2023	J. Yoon	B160/	Draft and revise fee statements for debtor's professionals.	0.70
10/24/2023	J. Yoon	B190/	Analyze and review appeal issues and procedures for interlocutory appeals in adversary proceedings (0.9); strategize appeal of Connecticut and Texas adversary proceedings (0.8); analyze and review case law and statutes regarding motion for leave to appeal interlocutory order (3.8)	4.50
10/25/2023	V. Driver	B160/	Review and analyze emails on fee statements.	0.70
10/25/2023	V. Driver	B190/	Lengthy emails and calls regarding settlement discussions and meeting logistics and preconditions to same with UCC (1.1); call with Sub V Trustee counsel re same (.5).	1.60
10/25/2023	V. Driver	B195/	Travel from Austin home (billed at half time 3.0).	1.50
10/25/2023	D. Harlan	B190/	Reclassify documents marked privileged for privilege log.	2.30
10/25/2023	D. Harlan	B195/	Travel back to Dallas from Austin (3.5). [Billed at half time]	1.70
10/25/2023	J. Jones	B190/	Research authority in the Fifth Circuit for interlocutory appeals.	3.20

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10/25/2023	D. McClellan	B190/	Draft motions for leave to file interlocutory appeal of Texas and Connecticut dischargeability orders	7.80
10/25/2023	C. Stephenson	B320/	Draft and revise Plan of Reorganization.	4.30
10/25/2023	E. Weaver	B160/	Review all invoices The Reynal Firm and Chris Martin Firm from the employment their date forward and prepare a spreadsheet of hours by timekeeper and calculate amounts by 50% to be shared with FSS.	4.20
10/25/2023	R. Yates	B190/	Conduct legal research on standards for leave to file interlocutory appeal from bankruptcy court to district court.	1.40
10/25/2023	J. Yoon	B160/	Analyze and review invoices of professionals Martin, Disiere, Jefferson & Wisdom LLP and The Reynal Law Firm, PC.	0.30
10/25/2023	J. Yoon	B190/	Analyze and review case law and statutes regarding motion for leave to appeal interlocutory order (1.1); analyze and review local rules and judge-specific rules in preparation to draft motion for leave to appeal interlocutory order (0.4)	1.50

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10/26/2023	J. Davis	B190/	Telephone call from Ray Battaglia who represents Free Speech Systems to discuss the recent rulings on summary judgment in the Connecticut and Texas adversary proceeding cases; discussion of next steps.	0.50
10/26/2023	V. Driver	B190/	Calls and emails discussing strategy on settlement meeting, venue, dates, and terms (2.4); analyze outstanding issues in discovery (.4).	2.80
10/26/2023	V. Driver	B230/	Analyze issues with listing rental property.	0.40
10/26/2023	D. Harlan	B190/	Review documents marked privileged for privilege log.	9.00
10/26/2023	J. Jones	B190/	Research authority in the Fifth Circuit for interlocutory appeals, specifically as they relate to bankruptcy for motion that Deric J. McClellan is filing.	2.50
10/26/2023	D. McClellan	B190/	Draft motions for leave to file interlocutory appeal of Texas and Connecticut dischargeability orders.	6.50
10/26/2023	C. Stephenson	B150/	Calls and correspondence regarding creditor communications.	1.80
10/26/2023	C. Stephenson	B160/	Review and revise September billing statement.	2.80
10/26/2023	C. Stephenson	B170/	Review and analyze correspondence regarding issues with billing.	1.40

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10/26/2023	E. Weaver	B160/	Draft first monthly fee statement for the Chris Martin Firm and The Reynal Firm.	4.80
10/26/2023	R. Yates	B190/	Review and assess arguments for appeal on summary judgment order.	2.70
10/26/2023	R. Yates	B190/	Draft necessarily decided section of motion for leave to appeal order on summary judgment relating to IIED and defamation default judgments.	2.70
10/26/2023	R. Yates	B190/	Cite check cases that summary judgment order relied upon.	0.40
10/26/2023	R. Yates	B190/	Draft arguments for substantial ground for difference of opinion necessary for leave of court to appeal interlocutory order.	0.60
10/26/2023	R. Yates	B190/	Review and assess CUTPA ruling and arguments on summary judgment order.	0.80
10/26/2023	R. Yates	B190/	Draft balancing test portion of motion for leave to file appeal of summary judgment order.	0.50
10/27/2023	V. Driver	B190/	Emails and calls moving R. Schleizer deposition (.8); emails and calls discussing issues with settlement terms and related issues (2.6); calls with client regarding same (.8); calls with R. Schleizer on same (.9).	5.10
10/27/2023	D. Harlan	B190/	Perform document review.	9.50

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10/27/2023	D. McClellan	B190/	Draft motions for leave to file interlocutory appeal of Texas and Connecticut dischargeability orders.	5.20
10/27/2023	E. Weaver	B160/	Work on and finalize draft of first monthly fee statement of the Chris Martin Firm and the Reynal Firm.	5.20
10/27/2023	R. Yates	B190/	Revise substantial disagreement portion of motion for leave to file appeal of order on summary judgment.	0.80
10/27/2023	R. Yates	B190/	Conduct legal research on controlling question of law for motion for leave to file appeal of interlocutory summary judgment order.	0.60
10/27/2023	R. Yates	B190/	Draft section on controlling question of law for motion for leave to appeal interlocutory summary judgment order.	0.90
10/27/2023	R. Yates	B190/	Draft argument on "actually litigated" prong for motion for leave to appeal interlocutory summary judgment order.	0.80
10/27/2023	R. Yates	B190/	Formulate strategy for consistency of argument across motions for leave to appeal between Connecticut and Texas drafts.	0.50
10/27/2023	R. Yates	B190/	Draft factual background section for motion for leave to appeal interlocutory summary judgment order.	1.20

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10/27/2023	J. Yoon	B190/	Analyze and review issues and strategies for background facts and procedural history in preparation to draft motion for leave to appeal an order on Connecticut Plaintiffs' motion for summary judgment (0.3); draft and revise the same (4.2).	4.50
10/28/2023	V. Driver	B110/	Call with client on status of case and related issues.	0.80
10/28/2023	D. Harlan	B190/	Perform document review.	3.80
10/28/2023	J. Yoon	B190/	Draft and revise motion for leave to appeal Connecticut interlocutory order.	4.30
10/29/2023	D. Harlan	B190/	Perform document review.	2.50
10/29/2023	D. McClellan	B190/	Draft motions for leave to file interlocutory appeal of Texas and Connecticut dischargeability orders.	7.50
10/30/2023	V. Driver	B190/	Draft initial settlement points for discussion and subsequent emails with recipients thereafter.	3.10
10/30/2023	D. Harlan	B190/	Perform document review.	6.70
10/30/2023	J. Jones	B190/	Research cases from the Fifth Circuit and from the District Court from the Southern District of Texas.	5.50

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10/30/2023	D. McClellan	B190/	Draft Connecticut motion for leave to file interlocutory appeal of Connecticut dischargeability order.	13.10
10/30/2023	C. Stephenson	B160/	Review and revise billing statement (3.8); review and respond to related correspondence (1.1).	4.90
10/30/2023	C. Stephenson	B190/	Review and respond to multiple correspondence and calls regarding settlement terms.	2.70
10/30/2023	E. Weaver	B160/	Draft eighth monthly fee statement of BlackBriar Advisors.	1.80
10/30/2023	E. Weaver	B310/	Continue reviewing claims register and downloading claims.	1.00
10/30/2023	R. Yates	B190/	Formulate strategy for addressing the argument that leave to file an appeal would materially advance the litigation.	0.80
10/30/2023	R. Yates	B190/	Edit and add details to factual background section of motion for leave to file appeal of interlocutory summary judgment order.	1.20
10/30/2023	R. Yates	B190/	Review memo on precedential legal standards for leave to appeal interlocutory order.	0.20
10/30/2023	R. Yates	B190/	Coordinate revisions of drafts for both Connecticut and Texas case briefs on motion for leave to appeal.	0.50

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10/30/2023	J. Yoon	B190/	Analyze and review issues regarding procedural posture and factual background in the motion for leave to appeal interlocutory Connecticut order.	0.40
10/31/2023	J. Davis	B190/	Review and edit Motion for Leave to Appeal.	2.50
10/31/2023	V. Driver	B190/	Call with Texas trial team on appellate status and budgeting (.6); emails regarding same (.2); call with client regarding issues with Texas budgeting and trial (.4).	1.20
10/31/2023	V. Driver	B190/	Call with Texas trial team on appellate status and budgeting (.6); emails regarding same (.2); call with client regarding issues with Texas budgeting and trial (.4).	1.20
10/31/2023	V. Driver	B240/	Emails and calls to P. Story on IRS claim and refund status (.7); emails with UCC sending tax filings and regarding additional tax requests (.4).	1.10
10/31/2023	V. Driver	B320/	Calls and emails with counsel for UCC and plaintiffs to discuss plan settlement issues, meeting scheduling, and strategy.	2.10
10/31/2023	D. Harlan	B190/	Perform document review.	10.50

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10/31/2023	D. McClellan	B190/	Draft motion for leave to file interlocutory appeal of Connecticut dischargeability order.	7.00
10/31/2023	D. McClellan	B190/	Draft motion for leave to file interlocutory appeal of Texas dischargeability order.	9.50
10/31/2023	C. Stephenson	B190/	Review and revise CT Motion for Leave to Appeal Interlocutory Order (5.7); draft related correspondence regarding appeal (1.2).	6.90
10/31/2023	R. Yates	B190/	Review edits to motion for leave to file appeal.	1.50
10/31/2023	J. Yoon	B190/	Draft and revise motion for leave to appeal Connecticut interlocutory order.	6.70
11/01/2023	J. Davis	B190/	Work with appellate team on the Motion for Leave for Interlocutory Appeal for the Connecticut Plaintiffs case, drafting and revising final draft.	1.20
11/01/2023	V. Driver	B190/	Preparation for and attend meeting with creditors to discuss resolution of various matters.	3.20
11/01/2023	V. Driver	B195/	Travel to and from Houston for meeting (6.0). [billed at half time]	3.00
11/01/2023	D. Harlan	B190/	Perform document review.	9.50

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11/01/2023	J. Jones	B190/	Create citation for brief in support of cited to authority for motion for Deric J. McClellan.	0.30
11/01/2023	D. McClellan	B190/	Draft and revise motion for leave to file interlocutory appeal of Connecticut dischargeability order.	3.50
11/01/2023	D. McClellan	B190/	Draft and revise motion for leave to file interlocutory appeal of Texas dischargeability order.	4.10
11/01/2023	D. McClellan	B190/	Develop strategy regarding Texas and Connecticut motions for leave to file interlocutory appeal of Connecticut dischargeability order.	0.50
11/01/2023	C. Stephenson	B190/	Review Notices of Appeal (.5); draft related correspondence (.9); review and revise Motions for Leave to Appeal Interlocutory Orders (7.8).	9.20
11/01/2023	E. Weaver	B190/	Locate court reporting firm that transcribed hearing transcript for 08-15-2023 hearing in both adversary cases (.1); communications with court reporting firm regarding same (.1); review and circulate transcript to team (.2).	0.40
11/01/2023	R. Yates	B190/	Respond to inquiry regarding scope of arguments in motion for leave to appeal.	0.80
11/01/2023	R. Yates	B190/	Review and edit Texas motion for leave to appeal.	1.10

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11/01/2023	R. Yates	B190/	Conduct legal research on requirements for notice of appeal to accompany motion for leave.	0.20
11/01/2023	R. Yates	B190/	Coordinate review of motion for leave to file appeal.	0.40
11/01/2023	R. Yates	B190/	Review edits and draft updated Question Presented.	1.60
11/01/2023	J. Yoon	B190/	Draft and revise motions for leave to appeal Connecticut and Texas interlocutory orders (7.8); draft and revise notices of appeal for both the Texas and Connecticut orders (2.9).	10.70
11/02/2023	J. Davis	B190/	Review and revise Motion for Leave to File Interlocutory Appeal related to the Texas plaintiffs' adversary proceeding and Judge Lopez's ruling.	2.60
11/02/2023	V. Driver	B110/	Emails with court rescheduling hearings.	2.00
11/02/2023	V. Driver	B190/	Calls with various claimants on issues regarding settlement (1.5); prepare for discussions with creditors (.8).	2.30
11/02/2023	D. Harlan	B190/	Reclassifying documents marked privileged.	0.80
11/02/2023	J. Jones	B190/	Proofread and revise motion for leave to appeal for Deric J. McClellan.	0.90
11/02/2023	D. McClellan	B190/	Draft and revise motion for leave to file interlocutory appeal of Connecticut dischargeability order.	6.90

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11/02/2023	D. McClellan	B190/	Draft and revise motion for leave to file interlocutory appeal of Texas dischargeability order.	4.20
11/02/2023	T. Rinck	B110/	Analyze draft Debtor Alexander Jones' Motion for Leave to Appeal Interlocutory Order.	0.40
11/02/2023	T. Rinck	B190/	Revise Motion for Leave to Appeal Interlocutory Order.	1.80
11/02/2023	T. Rinck	B190/	Draft and develop TOC and TOA for Debtor Alexander Jones' Motion for Leave to Appeal Interlocutory Order.	2.10
11/02/2023	T. Rinck	B190/	Draft and develop TOC and TOA to Motion for Leave to Appeal Order on Connecticut Plaintiffs' Motion for Summary Judgment.	3.20
11/02/2023	C. Stephenson	B190/	Review and revise Notices of Appeal (2.6); draft and review related correspondence (1.8); review and revise Motions for Leave to Appeal (4.4).	8.80
11/02/2023	E. Weaver	B160/	Email communications with Rachel Kennerly regarding fourth monthly fee statement.	0.20
11/02/2023	E. Weaver	B185/	Email communications with court coordinator regarding hearing date for the motion to assume or reject executory contracts.	0.20
11/02/2023	E. Weaver	B190/	Review case docket to determine notice parties (.3); finalize and file notice of appeal and motion for leave to appeal interlocutory order for Texas and Connecticut (2.0); e-serve notice parties (.4).	2.70

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11/02/2023	R. Yates	B190/	Coordinate with litigation team regarding final edits and preparations for filing.	0.50
11/02/2023	J. Yoon	B190/	Revise and finalize the motion for leave to appeal Texas interlocutory order (9.6); revise and finalize notices of appeal for both Connecticut and Texas adversary proceedings (1.7).	11.30
11/03/2023	J. Davis	B190/	Conference regarding settlement issues.	0.50
11/03/2023	V. Driver	B110/	Calls with client discussing case and strategy regarding same.	1.70
11/03/2023	V. Driver	B190/	Emails and calls with trial team sending appellate brief for review and comment (.8); call with All plaintiff counsel regarding setting up New York meeting terms. (.9)	1.70
11/03/2023	D. Harlan	B190/	Draft privilege log.	4.00
11/03/2023	D. McClellan	B190/	Review and revise potential filing related to Texas case.	1.90
11/03/2023	C. Stephenson	B190/	Review and revise Motions for Leave to Appeal (7.3); draft and review related correspondence (3.2).	10.50
11/03/2023	R. Yates	B190/	Review and revise documents and potential filings associated with Texas case regarding options for resolution.	2.20
11/04/2023	D. Harlan	B190/	Draft privilege log.	1.80

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Vickie L. Driver

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11/04/2023	D. McClellan	B190/	Review and revise potential filing related to Texas case.	0.70
11/04/2023	R. Yates	B190/	Review arguments and documents in support of resolution of Texas case.	1.60
11/05/2023	D. McClellan	B190/	Review and revise potential filing related to Texas case.	2.00
11/06/2023	J. Davis	B190/	Communications with client regarding appellate strategy matters.	1.50
11/06/2023	V. Driver	B190/	Introduce trial teams for input on appellate brief (.2); call with client regarding input from trial team (.4).	0.60
11/06/2023	V. Driver	B210/	Review and analyze FSS projections, changes from prior versions (1.1); calls with FA on issues with projections (.5); calls with client regarding same (.9); emails and calls with FSS and Sub V trustee counsel on projection issues (1.1).	3.80
11/06/2023	V. Driver	B240/	Emails with A. Cooksey on tax audit and outstanding information to be provided (.3); gather information on property tax payments made and position of owner of real estate on repayment (.5).	0.80
11/06/2023	D. Harlan	B190/	Privilege review of client documents to properly identify and mark as privileged in order to prepare corresponding privilege log.	3.80

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11/06/2023	D. Harlan	B320/	Research potential plan issues.	0.90
11/06/2023	E. Weaver	B160/	Review UCC's May, 2023 fee and expense summary and circulate to team.	0.10
11/06/2023	E. Weaver	B190/	Review UCCs third rescheduled 2004 examination of R. Schleizer and docket same.	0.10
11/06/2023	E. Weaver	B190/	Review UCC's 2004 Requests to Swan Bitcoin and docket deadline for same.	0.10
11/06/2023	R. Yates	B190/	Conference regarding issues related appeal.	0.50
11/07/2023	V. Driver	B190/	Preparation for settlement meeting.	1.20
11/07/2023	V. Driver	B195/	Travel to New York for settlement meeting (5.6 – billed at half time).	2.80
11/07/2023	V. Driver	B210/	Review and analyze plans confirmed by CRO and discuss issues with former plan agent (1.4); messages and calls with client on issues with operations (1.3); calls and emails on FSS projections and plan (.8).	3.40
11/07/2023	D. Harlan	B320/	Research and analyze potential plan issues.	8.50
11/07/2023	C. Stephenson	B110/	Review and respond to correspondence regarding case strategy matters.	2.30
11/07/2023	E. Weaver	B190/	Email communications and telephone call with court coordinator regarding appeal.	0.20

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11/07/2023	E. Weaver	B190/	Procure information related to trust agreement summaries and circulate to team and BlackBriar Advisors.	0.80
11/07/2023	R. Yates	B190/	Review and summarize constitutional arguments for use in potential resolution.	1.10
11/08/2023	V. Driver	B190/	Meeting to discuss strategy for larger meeting (2.5); meeting with Committee and Plaintiffs lawyers (3.1); discuss meeting and results. (1.3)	6.90
11/08/2023	D. Harlan	B190/	Privilege review of client documents to properly identify and mark as privileged in order to prepare corresponding privilege log.	1.50
11/08/2023	D. Harlan	B190/	Prepare deposition documents for R. Schleizer.	3.30
11/08/2023	D. Harlan	B190/	Attend settlement meeting.	2.80
11/08/2023	D. Harlan	B210/	Research concerns regarding potential plan and acceptable levels of capex, opex, and net disposable income.	1.60
11/08/2023	E. Weaver	B110/	Electronic case file management.	1.50
11/09/2023	J. Booth	B120/	Conference regarding trust summaries.	0.10
11/09/2023	V. Driver	B195/	Travel from New York for settlement meeting. (5.6 – billed at half time)	2.80

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Vickie L. Driver

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11/09/2023	D. Harlan	B210/	Research concerns regarding potential plan and acceptable levels of capex, opex, and net disposable income.	3.80
11/09/2023	C. McDonald	B190/	Email correspondence regarding Alex Jones' trust summaries.	0.10
11/09/2023	C. Stephenson	B110/	Respond to UST request for information.	0.30
11/09/2023	C. Stephenson	B190/	Review appellate notifications and draft related correspondence.	0.80
11/09/2023	E. Weaver	B110/	Review and organize bank statements received to date (.8); email correspondence to Kathy Norderhaug regarding all bank statements requested by trustee's office (.2).	1.00
11/09/2023	E. Weaver	B110/	Compile related documents for meeting with BlackBriar Advisors on 11-10-2023.	0.80
11/09/2023	E. Weaver	B185/	Draft notice of hearing for 11-27-2023 hearing.	0.40
11/09/2023	J. Yoon	B190/	Analyze and review federal rules of bankruptcy procedure, case law, statutes regarding prerequisites to perfecting an interlocutory appeal.	1.30
11/10/2023	V. Driver	B110/	Review and revising schedules and global notes regarding same.	1.30
11/10/2023	V. Driver	B140/	Email and call Dallas IRS contact seeking information on P. Story.	0.30

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Responsible Attorney

Vickie L. Driver

Post - petition

11/10/2023	V. Driver	B160/	Calls with client on status of attorney bills and forecasting (.8); emails to Texas trial team seeking budget and max billing now that appeal is filed (.2); draft Attorney fee budget and forecast to client (.4); draft emails to allow Reynal firm to apply retainer (.1).	1.50
11/10/2023	V. Driver	B190/	Preparation for R. Schleizer deposition (1.8); review Texas case law on transferring real property and effectiveness of writing and recordation. (.3)	2.10
11/10/2023	D. Harlan	B190/	Research and analyze deed conveyance law in Texas.	0.30
11/10/2023	D. Harlan	B190/	Privilege review of client documents to properly identify and mark as privileged in order to prepare corresponding privilege log.	1.50
11/10/2023	C. McDonald	B190/	Email correspondence regarding AJ trusts.	0.20
11/10/2023	C. Ottaway	B190/	Correspondence regarding trust issues.	0.30
11/10/2023	C. Stephenson	B110/	Perform research and analysis regarding schedule amendments.	1.80
11/10/2023	C. Stephenson	B190/	Analyze UCC correspondence and draft related summary correspondence.	1.60
11/10/2023	E. Weaver	B110/	Revisions to third amended schedules and circulate to team for review.	1.00

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Vickie L. Driver

Post - petition

11/10/2023	E. Weaver	B185/	Finalize and file notice of hearing for 11-27-2023 hearing and docket same.	0.30
11/10/2023	E. Weaver	B185/	Finalize and file amended notice of hearing for 11-27-2023 hearing and docket same.	0.30
11/12/2023	V. Driver	B190/	Initial review of settlement offer and calls with L. Freeman on same.	1.20
11/12/2023	D. Harlan	B210/	Research concerns regarding potential plan and acceptable levels of capex, opex, and net disposable income.	1.60
11/12/2023	R. Yates	B190/	Conduct legal research on the Tenth Circuit approach to "willful and malicious injury" under Section 523(a)(6).	0.70
11/13/2023	J. Booth	B210/	Communications regarding disability language in the employment agreement.	0.30
11/13/2023	C. Chamberlain	B210/	Correspondence regarding disability provision for settlement terms.	0.10
11/13/2023	V. Driver	B110/	Review and amend schedules, SOFA and Global Notes.	0.90
11/13/2023	V. Driver	B130/	Call with S. Brauner on personal property sale motion and order (.2); revise both and prepare for filing. (.4)	0.60
11/13/2023	V. Driver	B160/	Confirming monthly fee statement filing status.	0.90

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Responsible Attorney

Vickie L. Driver

Post - petition

11/13/2023	V. Driver	B190/	Calls with various parties discussing settlement proposal from plaintiffs (2.1); review in detail and revise settlement offer with initial thoughts (1.1); call with client explaining offer and intention in response (.8).	4.00
11/13/2023	V. Driver	B190/	Emails and calls moving deposition for R. Schleizer and discussing settlement issues.	0.80
11/13/2023	V. Driver	B240/	Calls with A. Jenkins seeking information on who to call in Houston regarding refund and claim made.	0.30
11/13/2023	D. Harlan	B120/	Call regarding trusts in preparation for R. Schleizer's deposition.	0.50
11/13/2023	D. Harlan	B320/	Research and analyze potential plan confirmation issues related to maximum net disposable income and capital/operating expenditures.	4.60
11/13/2023	D. Harlan	B320/	Research and analyze case law authorities governing plan confirmation time period.	2.10
11/13/2023	C. McDonald	B190/	Prepare for call and call regarding Alex Jones' trusts.	1.40
11/13/2023	C. Ottaway	B190/	Review various trusts (.5); conference regarding same (.8).	1.30
11/13/2023	C. Stephenson	B120/	Call regarding trust ownership and issues.	0.80

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Responsible Attorney

Vickie L. Driver

Post - petition

11/13/2023	C. Stephenson	B190/	Review and analyze settlement offer and related correspondence.	1.30
11/13/2023	C. Stephenson	B320/	Perform and analyze research regarding plan issues (2.2); draft plan and disclosure statement (2.8).	5.00
11/13/2023	E. Weaver	B110/	Compile October bank statements and circulate to the trustee's office.	0.80
11/13/2023	E. Weaver	B160/	Draft ninth monthly fee statement for Crowe & Dunlevy.	1.20
11/13/2023	E. Weaver	B160/	Review spreadsheet received from BlackBriar Advisors and draft eighth monthly fee statement.	1.40
11/13/2023	J. Yoon	B160/	Analyze and review professional Pattis & Smith, LLC's employment application regarding fees and costs of the scope of employment.	0.40
11/14/2023	V. Driver	B130/	Prepare motion to sell personal property for filing (.4); emails with UCC regarding same (.1).	0.50

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Responsible Attorney

Vickie L. Driver

Post - petition

11/14/2023	V. Driver	B190/	Meeting with client to discuss counter proposal terms and discuss strategy on case outcomes under settlement and other scenarios (2.6); analyze and strategize regarding counter proposal terms (2.8); attempt to schedule meeting with FSS to discuss counter proposal terms (.6); emails with Texas counsel on trial continuance (.2).	6.20
11/14/2023	V. Driver	B195/	Travel to Austin for settlement meeting (6.0 – billed at half time).	3.00
11/14/2023	V. Driver	B320/	Analyze and strategize plan terms on multiple tracks.	1.60
11/14/2023	D. Harlan	B320/	Research and analyze various plan issues.	7.10
11/14/2023	C. Stephenson	B160/	Review and revise fee statement for Blackbriar Advisors and draft related correspondence.	0.70
11/14/2023	C. Stephenson	B190/	Review and revise potential counter-offer/term sheet (1.8); draft multiple related correspondence (1.4).	3.20
11/14/2023	C. Stephenson	B320/	Perform and analyze plan related research and draft related correspondence.	2.80
11/14/2023	E. Weaver	B160/	Finalize, file and e-serve ninth monthly fee statement for Crowe & Dunlevy.	0.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/14/2023	J. Yoon	B320/	Analyze and review statutes and case law regarding issues and strategies in preparation for drafting plan.	3.50
11/15/2023	C. Campbell	B110/	Review and respond to emails regarding employment agreement.	0.10
11/15/2023	V. Driver	B110/	Send email from UST to BBA to assemble bank account statements.	0.10
11/15/2023	V. Driver	B210/	Correspondence with client regarding media industry decline and send article on same to FSS counsel.	0.40
11/15/2023	D. Harlan	B190/	Perform document review.	2.70
11/15/2023	D. Harlan	B320/	Research and analyze case law authorities governing plan confirmation time period.	2.30
11/15/2023	D. Harlan	B320/	Research and analyze governing case law authorities in Texas, and elsewhere, on plan obligations.	3.90
11/15/2023	C. Stephenson	B110/	Review and respond to multiple correspondence regarding schedule amendments (2.1); draft correspondence to UCC regarding same (.1); review and respond to UST requests (.5).	2.70
11/15/2023	E. Weaver	B160/	Finalize, file and e-serve eighth monthly fee statement for BlackBriar Advisors.	0.70

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Responsible Attorney
Vickie L. Driver

Post - petition

11/15/2023	J. Yoon	B320/	Analyze and review statutes and case law regarding issues and strategies in preparation for drafting plan.	7.50
11/16/2023	D. Harlan	B320/	Research, analyze, and take notes on governing case law for preparation of plan.	6.90
11/16/2023	D. McClellan	B190/	Review and analyze response brief in opposition to motion for interlocutory appeal of Texas order.	1.10
11/16/2023	C. Stephenson	B110/	Draft and review correspondence with UCC regarding schedule amendments (.3); correspondence and conferences regarding schedule amendments and client approval of same (.8).	1.10
11/16/2023	E. Weaver	B110/	Revise schedules A/B, C & G and Statement of Financial Affairs and circulate to BlackBriar Advisors for review (2.0); email correspondence to BlackBriar regarding revisions (.3).	2.30
11/16/2023	J. Yoon	B190/	Analyze and review local and judge-specific rules in anticipation of a reply brief to the responses in opposition to the motion for leave to appeal interlocutory orders.	0.30
11/17/2023	V. Driver	B190/	Call with Sub V Trustee on status of settlement (.4); emails on extension on appeals (.2); emails on settlement offer (.1).	0.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/17/2023	D. Harlan	B190/	Conducting privilege review of final client documents to properly identify and mark as privileged said documents in order to prepare corresponding privilege log.	4.50
11/17/2023	D. Harlan	B320/	Research and analyze governing case law regarding various plan issues.	4.80
11/17/2023	C. Stephenson	B110/	Draft and review correspondence regarding amended schedules.	1.30
11/17/2023	C. Stephenson	B320/	Review and analyze amended FSS Plan (1.2); conferences regarding plan research matters (1.1).	2.30
11/17/2023	R. Yates	B190/	Formulate and discuss strategy for reply brief.	0.60
11/17/2023	J. Yoon	B190/	Analyze issues regarding responses and strategize reply brief (0.2); draft email and proposed agreed order extending reply briefing deadline (4).	4.20
11/18/2023	V. Driver	B190/	Review and finalize settlement offer and send to counsel.	0.80
11/18/2023	D. Harlan	B190/	Conduct privilege review of final client documents to properly identify and mark as privileged said documents in order to prepare corresponding privilege log.	5.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/19/2023	D. Harlan	B320/	Research governing case law authorities for disposable income in plans for high net worth individuals in preparation for plan submission.	6.00
11/19/2023	J. Yoon	B320/	Analyze and review issues in preparation to draft plan and strategy for plan confirmation.	9.10
11/20/2023	V. Driver	B110/	Analyzing changes to schedules.	1.10
11/20/2023	V. Driver	B160/	Review and approve real estate broker contract for ranch.	0.40
11/20/2023	V. Driver	B190/	Preparation for and attend call with UCC, Texas and CT plaintiffs, FSS, and PQPR to discuss settlement and related issues (.8); calls subsequent to call regarding responses to UCC and Plaintiff intent to break standstill on plan filing (1.4); call with Texas counsel on appeal extension request and email Trial counsel on same (.4); draft email seeking briefing extension on appeals (.3).	2.90
11/20/2023	V. Driver	B210/	Calls with client on IT manager leaving FSS (.5); emails with FSS and Sub V counsel on plans to replace IT manager (.1); call with FSS counsel on IT manager departure (.3).	0.90

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Vickie L. Driver

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11/20/2023	V. Driver	B320/	Analyze issues with plan drafting, structure, forecasting drafts, and related issues to plan preparation (2.1); call with client to discuss plan filing issues and next steps (.8).	2.90
11/20/2023	D. Harlan	B320/	Attend Plan confirmation call.	0.30
11/20/2023	D. Harlan	B320/	Draft and revise memo regarding Plan related research.	3.60
11/20/2023	D. McClellan	B190/	Review and analyze response brief in opposition to motion for interlocutory appeal of Connecticut and Texas order.	2.20
11/20/2023	C. Stephenson	B320/	Draft Plan of Reorganization (6.3); draft related correspondence (.4).	6.70
11/20/2023	E. Weaver	B170/	Download and review seventh, eighth and ninth monthly fee statements for Teneo Capital, LLC and docket objection deadline for same.	0.40

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Vickie L. Driver

Post - petition

11/20/2023	J. Yoon	B190/	Exchange emails with Connecticut and Texas counsel regarding redline and agreement on proposed agreed orders extending reply briefing deadlines in the motion for leave to appeal interlocutory orders (0.3); revise proposed agreed orders incorporating accepted proposed changes from opposing counsel (0.4); review local rules and judge's procedure regarding extension of briefing deadlines and email the court the proposed agreed orders and regarding the same (0.7).	1.40
11/20/2023	J. Yoon	B190/	Analyze and review pro hac vice procedures in the Southern District of Texas and for Judge Eskridge.	0.20
11/20/2023	J. Yoon	B320/	Analyze and review issues regarding plan and status conference regarding a scheduling order for the plan (0.3); draft and revise request for status conference regarding plan timeline (1.3); draft and revise proposed order granting the same (0.5).	2.10

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Responsible Attorney
Vickie L. Driver

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11/21/2023	V. Driver	B190/	Review email from S. Brauner regarding call on settlement and UCC desire to file draft plan and seek scheduling order for Jones to exit BK and discuss same (1.1); call with S. Brauner discussing scheduling for plan confirmation (.7).	1.80
11/21/2023	V. Driver	B210/	Review and discuss objection to cash collateral use for increased salary (.7); review and analyze evidence to support income history for Jones from FSS (.8).	1.50
11/21/2023	V. Driver	B320/	Draft and revising request for status conference and preparing for filing.	1.70
11/21/2023	V. Driver	B320/	Analyze issues relating to plan drafting and progress.	2.20
11/21/2023	D. Harlan	B190/	Perform document review.	1.00
11/21/2023	D. Harlan	B320/	Draft and revise Plan research memo.	1.60
11/21/2023	C. Stephenson	B110/	Review Motion for Status Conference (.8); draft related correspondence (.5).	1.30
11/21/2023	C. Stephenson	B190/	Review Court correspondence and draft related correspondence.	1.30
11/21/2023	C. Stephenson	B320/	Analysis regarding Plan and Disclosure Statement issues.	1.70

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Responsible Attorney
Vickie L. Driver

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11/21/2023	E. Weaver	B110/	Review spreadsheet received from BlackBriar Advisors and draft, finalize and file October monthly operating report.	3.00
11/21/2023	E. Weaver	B185/	Draft, finalize and file W&E list for 11-27-2023 hearing.	0.70
11/21/2023	J. Yoon	B190/	Analyze and review deficiency notices for the two interlocutory appeals and call the court clerk's office regarding the same.	0.40
11/22/2023	V. Driver	B110/	Review and analyze amended schedules and sofa and global notes and prepare for filing.	0.90
11/22/2023	V. Driver	B185/	Preparing materials for hearing on motion to reject contract and amended witness and exhibit list.	0.80
11/22/2023	V. Driver	B190/	Correspondence with Texas plaintiffs counsel regarding extension with tax appeal briefing schedules.	0.20
11/22/2023	E. Weaver	B185/	Revise, finalize and file amended W&E for 11-27-2023 hearing (.4); procure exhibits corresponding to list, label and file (.6).	1.00
11/22/2023	E. Weaver	B185/	Compile related pleadings for hearing notebooks and general hearing prep for 11-27-2023 hearing.	3.00

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Responsible Attorney

Vickie L. Driver

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11/25/2023	E. Weaver	B110/	Telephone call with R. Schleizer regarding payment transfers (.2); revise third amended schedules, statement of financial affairs and global notes to reflect updates by client and BlackBriar Advisors (1.8).	2.00
11/26/2023	V. Driver	B110/	Review and analyze pleadings in preparation for hearings.	1.80
11/26/2023	V. Driver	B195/	Travel to Houston for hearings and deposition of R. Schleizer (billed at half-time 3.6).	1.80
11/26/2023	D. Harlan	B185/	Draft proffer regarding the contracts in the motion to reject.	0.50
11/26/2023	D. Harlan	B195/	Traveling to Houston from Dallas. (3.5) [Billed at half time]	1.70
11/26/2023	E. Weaver	B110/	Revise, finalize and file schedules, statement of financial affairs and global notes.	1.40
11/27/2023	V. Driver	B110/	Preparation for and attend status conference in case (1.1); follow up with client after hearing to discuss outcome and next steps (.7).	1.80

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Vickie L. Driver

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11/27/2023	V. Driver	B185/	Review and analyze motion to reject and responses and objections in preparation for hearing (.9); review and revise proffer for client's testimony in support of motion to reject (.4); review proffer and hearing protocol with client (.8); attend hearing on motion to reject contract (.7).	2.80
11/27/2023	V. Driver	B190/	Meetings with FSS and PQPR counsel discussing settlement potential and related issues.	0.80
11/27/2023	V. Driver	B210/	Preparation for and attend FSS hearing on cash collateral hearing.	2.10
11/27/2023	V. Driver	B320/	Initial review of UCC draft plan.	1.50
11/27/2023	D. Harlan	B110/	Attend FSS and Debtor hearing.	3.00
11/27/2023	D. Harlan	B190/	Perform document review.	3.80
11/27/2023	D. Harlan	B190/	Draft proffer regarding contracts under motion to reject.	0.80
11/27/2023	E. Weaver	B110/	Finalize and submit proposed order granting motion for status conference (.2); telephone call with court coordinator regarding same (.1); draft, finalize and file notice of status conference for 11-27-2023 (.5).	0.80
11/27/2023	J. Yoon	B190/	Review docket and call the Court regarding the proposed agreed orders extending reply brief deadlines.	0.40

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Vickie L. Driver

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11/27/2023	J. Yoon	B320/	Review and revise Notice of Status Conference regarding plan proposal.	0.30
11/28/2023	N. Collins	B240/	Evaluate tax status and personal property renditions for debt-related entity.	2.60
11/28/2023	V. Driver	B190/	Preparation for and attend deposition of R. Schleizer.	7.50
11/28/2023	V. Driver	B190/	Email to Dr. Jones' counsel on need to refund expenses due from Trust owning condos.	0.10
11/28/2023	V. Driver	B195/	Travel from Houston. (billed at half time 3.7)	1.80
11/28/2023	D. Harlan	B190/	Perform document review.	2.40
11/28/2023	D. Harlan	B190/	Attend deposition of R. Schleizer.	7.50
11/28/2023	E. Weaver	B170/	Review seventh, eighth and ninth monthly fee statements for Teneo Capital for compliance with fee guidelines.	4.00
11/28/2023	J. Yoon	B190/	Check status of proposed agreed orders extending reply briefing deadlines in the Connecticut and Texas interlocutory appeals.	0.30
11/28/2023	J. Yoon	B240/	Research and analyze tax issues.	2.50
11/29/2023	J. Davis	B190/	Review of the two court orders which grant additional time to file reply brief in support of our Motion for Leave to File Appeal.	0.10

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Responsible Attorney
Vickie L. Driver

Post - petition

11/29/2023	V. Driver	B160/	Emailing BBA on app to employ brokers and status.	0.20
11/29/2023	V. Driver	B190/	Call with PQPR counsel on status of adversary case and service issues.	0.70
11/29/2023	V. Driver	B320/	Review and comment to plan confirmation scheduling order.	0.60
11/29/2023	D. Harlan	B190/	Finishing review of privileged documents in anticipation of privilege log prep.	6.40
11/29/2023	D. Harlan	B195/	Travel back to Dallas from Houston (3.7). [Billed at half time]	1.80
11/29/2023	E. Weaver	B170/	Review spreadsheet of fee detail for the Teneo Capital fee statements and mark time entries for objection (3.0); revise and update spreadsheet (.8).	3.80
11/29/2023	J. Yoon	B190/	Contact the Court regarding reply brief extensions.	0.20
11/30/2023	V. Driver	B190/	Emails with counsel for UCC on KJ bankruptcy case (.2); emails with CH 13 trustee in CH 13 case (.2); call with FSS counsel on CH 13 case (.4); call with PQPR counsel on KJ case (.3).	1.10
11/30/2023	D. Harlan	B190/	Perform document review.	4.20
11/30/2023	E. Weaver	B110/	Compile and circulate all bank statements and other requested bank information to trustee via filesare.	2.00

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Responsible Attorney

Vickie L. Driver

Post - petition

11/30/2023	E. Weaver	B110/	Review proposed agreed scheduling order and circulate to team.	0.20
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Total Hours	1,113.80
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Total Fees for this Invoice

\$508,228.00

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	77.50	42,513.50	Bankruptcy - Case Administration
B120	8.90	4,712.50	Bankruptcy - Asset Analysis and Recovery
B130	14.70	8,994.50	Bankruptcy - Asset Disposition
B140	0.30	238.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B150	3.10	1,651.00	Bankruptcy - Meetings of and Communications with Creditors
B160	74.80	31,876.00	Bankruptcy - Fee/Employment Applications
B170	9.60	3,420.00	Bankruptcy - Fee/Employment Objections
B185	11.70	5,958.00	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	647.10	261,202.00	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	38.50	26,894.00	Bankruptcy - Non-Working

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Vickie L. Driver

Post - petition

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
			Travel
B210	42.40	26,029.50	Bankruptcy - Business Operations
B230	1.70	1,094.00	Bankruptcy - Financing/Cash Collections
B240	30.50	18,754.50	Bankruptcy - Tax Issues
B310	12.60	8,789.00	Bankruptcy - Claims Administration and Objections
B320	140.40	66,101.00	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	1113.80	\$508,228.00	

10/03/2023	Harlan, Danielle reimbursement of travel expenses to Austin and Houston Texas for depositions 9/26-28/2023; transportation \$ 743.80 and meal \$ 44.70	\$788.50
10/05/2023	Digital Mountain for Electronic Discovery/ProtonMail collection	300.00
10/05/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of September 2023	4,940.00
10/11/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for meeting with client regarding litigation preparation 1/24-26/2023; 404 miles x .655/mile= \$ 264.62, lodging \$ 898.73 and meal \$ 52.07	1,215.42
10/11/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for SUBV Trustee Meeting 2/13-15/2023; 404 miles x .655/mile= \$ 264.62, lodging \$ 1253.63 and meals \$ 246.70	1,764.95
10/11/2023	Driver , Vickie reimbursement of additional expenses to Austin Texas 2/21-24/2023; 404 miles x .655/mile= \$ 264.62, transportation	730.20

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Responsible Attorney
Vickie L. Driver

Post - petition

\$ 120.99 lodging \$ 209.12 and meals \$ 135.47

10/11/2023	VENDOR: Federal Express Corporation; INVOICE#: 829149244; DATE: 10/20/2023 - Federal Express delivery to Vickier Driver, 304 E. Cesar Chavez, Austin, TX 78701 on 10/12/2023	101.72
10/12/2023	Driver , Vickie reimbursement of additional travel expenses with Amanda Finch to Austin, TX for client meetings 3/7-8/2023; transportation \$ 516.00	516.00
10/17/2023	Driver , Vickie reimbursement of travel expense to Austin Texas for client meeting 4/24-25/2023; lodging \$ 755.94	755.94
10/18/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for client meeting 3/29-30/2023; 404 miles x .655/mile= \$ 264.62, lodging \$ 842.00 and meals \$ 52.18	1,158.80
10/18/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for client meeting 4/11-13/2023; transportation \$ 540.05, lodging \$ 418.87 and meals \$ 47.04	1,005.96
10/18/2023	Driver , Vickie reimbursement of travel expenses to Los Angeles, California for deposition 5/17-18/2023; transportation \$ 470.28 and lodging \$ 340.45	810.73
10/18/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for depositions 6/28-29/2023; transportation \$ 451.65, lodging \$ 281.25 and meals \$ 94.22	827.12
10/18/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for client meetings 10/1-4/2023; 404 miles x .655/mile= \$ 264.62, lodging \$ 996.37 and meals \$ 71.52	1,332.51
10/18/2023	Driver , Vickie reimbursement of travel expense to Austin Texas for client meetings 10/10/2023; lodging \$ 380.25	380.25
10/24/2023	Proton email upgrade for Digital Mountain email collection 9/29/2023	4.99
10/31/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for depositions 8/30/2023 through 9/1/2023; 402 miles x .655/mile= \$ 263.31 and lodging \$ 465.47	728.78

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Vickie L. Driver

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10/31/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for depositions 9/10-14/2023; 402 miles x .655/mile= \$ 263.61, lodging \$ 772.97 and meals \$ 330.66	1,366.94
10/31/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for deposition 9/26-28/2023; transportation \$ 712.75, lodging \$ 1127.88 and meal \$ 91.44	1,932.07
10/31/2023	Harlan, Danielle reimbursement of travel expenses to Austin Texas for depositions 10/23-25/2023; transportation \$ 14.77, meals 158.84 and supplies \$ 50.29	223.90
11/06/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of October 2023	5,005.00
11/13/2023	Driver , Vickie reimbursement of travel expenses to Houston Texas for depositions 11/1/2023; transportation \$ 487.96 and meals \$ 91.80	579.76
11/13/2023	Driver , Vickie reimbursement of travel expenses to New York for Negotiations 11/7-9/2023; transportation \$ 955.03, lodging \$ 1349.19 and meals \$ 91.58	2,395.80
11/13/2023	Harlan, Danielle reimbursement of working lunch during deposition 11/8/2023	58.71
11/22/2023	Access Transcripts for copy of Hearing Transcript 11/1/2023	182.25
11/22/2023	Texas Southern Bankruptcy Court for filing fee 11/2/2023	298.00
11/22/2023	Texas Southern Bankruptcy Court for filing fee 11/2/2023	298.00
11/29/2023	Driver , Vickie reimbursement of travel expenses to Houston Texas regarding Settlement Negotiations 11/26-29/2023; transportation \$ 534.18, lodging \$ 760.68 and meals \$ 129.39	1,424.25

Subtotal of Expenses	\$31,126.55
Online Research	\$1.20
Subtotal of Costs	\$1.20
Total Expenses and Costs for this Invoice	\$31,127.75

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Vickie L. Driver

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SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E102	182.25	Outside printing
E106	1.20	On-line research
E107	101.72	Delivery services/messengers
E110	19,937.88	Out-of-town travel
E111	58.71	Meals
E112	596.00	Court fees
E118	9,945.00	Litigation support vendors
E123	304.99	Other professionals
Total	<u>\$31,127.75</u>	

Total For This Invoice

\$539,355.75

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Responsible Attorney

Vickie L. Driver

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SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
C. Ottaway	1.60	525.00	840.00
L. Dauphin	2.30	185.00	425.50
T. Rinck	7.50	200.00	1,500.00
D. McClellan	106.30	310.00	32,953.00
C. Campbell	0.10	265.00	26.50
V. Driver	233.30	795.00	185,473.50
C. Stephenson	137.00	715.00	97,955.00
J. Booth	0.40	265.00	106.00
C. Chamberlain	0.10	275.00	27.50
E. Weaver	78.40	295.00	23,128.00
C. McDonald	2.10	255.00	535.50
J. Jones	12.40	235.00	2,914.00
R. Yates	40.30	340.00	13,702.00
N. Collins	20.70	675.00	13,972.50
J. Davis	11.40	475.00	5,415.00
J. Yoon	96.40	285.00	27,474.00
D. Harlan	363.50	280.00	101,780.00
Total	1,113.80		\$508,228.00

EXHIBIT “G”

Eleventh Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**ELEVENTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	12/01/2023	12/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$146,882.80 ¹ (80% of \$183,603.50)	
Total Reimbursable Expenses Requested in this Statement:	\$16,805.98 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$172,831.00	
Total Actual Attorneys Hours Covered by this Statement:	380.60	
Average Hourly Rate for Attorneys:	\$454.10	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$10,772.50	
Total Actual Paraprofessional Hours Covered by this Statement:	38.90	
Average Hourly Rate for Paraprofessionals:	\$276.92	

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Eleventh Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from December 1, 2023 through December 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$146,882.80 (80% of \$183,603.50) as compensation for professional services rendered to the Debtor during the period from December 1, 2023 through December 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$16,805.98, for a total amount of \$163,688.78 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “**Objection**”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$183,603.50 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$16,805.98 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$163,688.78 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX
Dated: February 5, 2024

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 737.218.6187
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on February 5, 2024, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	2,732.98
Online Research	247.80
Court Fees	588.0
Deposition Transcripts	3,021.20
Litigation Support Vendors	10,036.00
Other Professionals	180.00

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	1.4	5.5
B120 Asset Analysis and Recovery	0.0	0.0
B130 Asset Disposition	2.6	2.8
B140 Relief from Stay/Adequate Protection	1.7	0.0
B150 Meetings of & Communications with Creditors	0.0	0.0
B160 Fee/Employment Applications	20.7	15.4
B170 Fee/Employment Objections	6.2	1.4
B180 Avoidance Action Analysis	0.0	0.0
B185 Assumption/Rejection of Executory Contracts	0.0	0.0
B190 Other Contested Matters	99.2	5.4
B195 Non-Working Travel	13.6	0.0
B210 Business Operations	4.6	0.0
B220 Employee Benefits/Pensions	0.00	0.0
B230 Financing/Cash Collections	1.5	0.0
B240 Tax Issues	0.0	0.0
B250 Real Estate	0.0	0.0
B260 Board of Directors Matters	0.0	0.0
B310 Claims Administration and Objections	6.5	2.2
B320 Plan and Disclosure Statement	222.6	0.0
B410 General Bankruptcy Advice/Opinions	0.0	0.0
B420 Restructurings	0.0	0.0
TOTALS:	380.6	38.9

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE & DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

February 2, 2024
Invoice # 770571

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post - petition

INVOICE SUMMARY

Current Invoice Total Fees	<u>\$183,603.50</u>
Current Invoice Total Expenses	<u>\$16,805.98</u>
Current Invoice Total	<u>\$200,409.48</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 770571 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

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Matter # 00802

Responsible Attorney

Vickie L. Driver

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12/01/2023	J. Davis	B190	Assist with reviewing, editing, and drafting of the Reply Briefs in support of our Motion for Leave to Appeal, filed in both the Texas Plaintiffs and Conn. Plaintiffs adversary proceedings.	4.50
12/01/2023	V. Driver	B320	Review case law on third party injunctions.	1.10
12/01/2023	D. McClellan	B190	Draft reply to Connecticut plaintiff's response to Debtor's motion for leave to file interlocutory appeal.	7.50
12/01/2023	E. Weaver	B110	Review email correspondence from Yasmine Rivera with the US Trustee's office regarding quarterly fees and forward same to BlackBriar Advisors.	0.20
12/01/2023	E. Weaver	B110	Review agreed scheduling order for confirmation hearing and docket all dates and deadlines.	1.30
12/01/2023	E. Weaver	B170	Finalize fee detail spreadsheet for Teneo Capital and circulate to BlackBriar Advisors.	1.00
12/01/2023	R. Yates	B190	Coordinate regarding legal strategy and planning for reply brief in support of motion for leave to file interlocutory appeal.	0.50
12/01/2023	J. Yoon	B190	Analyze and review local rules and judge-specific rules cross-motion requirements for appeals.	0.70
12/02/2023	D. McClellan	B190	Continue drafting reply to Connecticut plaintiff's response to Debtor's motion for leave to file interlocutory appeal.	14.20
12/03/2023	D. Harlan	B190	Perform research and analysis for reply brief.	1.70
12/03/2023	D. Harlan	B190	Research SD Tex and Judge's rules regarding motions and responses.	0.60
12/03/2023	D. McClellan	B190	Draft reply to Texas plaintiff's response to Debtor's motion for leave to file interlocutory	7.30

Jones, Alex "AJ"

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			appeal.	
12/03/2023	D. McClellan	B190	Continue drafting reply to Connecticut plaintiff's response to Debtor's motion for leave to file interlocutory appeal.	8.20
12/03/2023	C. Stephenson	B190	Review and revise Reply to CT Response to Motion for Leave to Appeal (.9); draft related correspondence (.8).	1.70
12/03/2023	R. Yates	B190	Edit draft of reply in support of motion for leave to file interlocutory appeal.	1.20
12/03/2023	J. Yoon	B190	Analyze and review interlocutory appeals in preparation to draft reply to the response to the motion for leave to appeal interlocutory appeals.	1.50
12/04/2023	D. Harlan	B160	Gathering and analyzing relevant documents to draft informal objection to Teneo's eighth and ninth monthly fee statements.	0.70
12/04/2023	D. McClellan	B190	Revise and finalize replies to Connecticut and Texas plaintiffs' responses to Debtor's motions for leave to file interlocutory appeal.	4.80
12/04/2023	C. Stephenson	B170	Review and analyze Teneo fee objections (.9); draft related correspondence (.5).	1.40
12/04/2023	C. Stephenson	B190	Review and analyze Replies to Responses to Motion for Leave to Appeal (1.7); review and respond to related correspondence (.8).	2.50
12/04/2023	E. Weaver	B170	Final review of Teneo fee spreadsheet and email correspondence to Bob Schleizer regarding same.	0.40
12/04/2023	E. Weaver	B190	Finalize and file AJ's reply to plaintiffs' response in opposition to defendant's motion for leave to file interlocutory appeal in each adversary.	0.80
12/04/2023	R. Yates	B190	Review final drafts of reply on motion for leave to file interlocutory appeal.	0.90
12/04/2023	J. Yoon	B190	Research timeliness of cross-appeal of	9.40

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

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			interlocutory appeal (0.7); draft and revise Texas and the Connecticut reply briefs (8.7).	
12/04/2023	J. Yoon	B190	Draft and revise pro hac vice motions for admissions of Deric J. McClellan and Chris Davis.	0.70
12/05/2023	L. Dauphin	B190	Apply pre-production quality and coding conflict checks.	0.40
12/05/2023	V. Driver	B140	Review and approve lift stay continuance (.2); emails to TX trial team on extension of stay and budget limitations. (.2)	0.40
12/05/2023	V. Driver	B160	Draft correspondence regarding employment of real estate brokers.	0.60
12/05/2023	V. Driver	B170	Review notice of increased hourly rates from Akin.	0.20
12/05/2023	V. Driver	B190	Review and revise entry of appearance and suggestion of BK in FSS and PQPR adversary (.4); review document production. (2.4)	2.80
12/05/2023	D. Harlan	B130	Review and edit Motion to Employ Broker for sale of the lakehouse property.	0.60
12/05/2023	D. Harlan	B190	Perform document review.	1.50
12/05/2023	D. Harlan	B320	Research relevant information and drafting disclosure statement.	6.50
12/05/2023	C. Stephenson	B170	Review and respond to various correspondence regarding fee objections.	0.80
12/05/2023	E. Weaver	B110	Download, review notice of rate increase filed by UCC and circulate to team.	0.10
12/05/2023	E. Weaver	B130	Review email correspondence from BlackBriar Advisors regarding storage facility liquidation and contract regarding same.	0.30
12/05/2023	E. Weaver	B130	Review listing agreement and revise motion to employ broker for the lake house property (.8); prepare redline of same and circulate for	1.00

Jones, Alex "AJ"

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			approval (.2).	
12/05/2023	E. Weaver	B160	Review listing agreement and revise motion to employ broker for the ranch property (.8); prepare redline of same and circulate for approval (.2).	1.00
12/05/2023	E. Weaver	B190	Draft notice of appearance and suggestion of bankruptcy for the PQPR Holdings adversary.	1.50
12/05/2023	J. Yoon	B190	Draft and prepare pro hac vice motions for Deric J. McClellan and Chris Davis for admission to respective proceedings in the Connecticut appeal and the Texas appeal.	1.40
12/06/2023	V. Driver	B130	Review and revise CNO for property sale.	0.20
12/06/2023	V. Driver	B190	Review and respond to detailed emails on follow up items related to discovery requests (.9); work through issues to get responses to discovery items (1.3).	2.40
12/06/2023	V. Driver	B320	Call with creditors working on plan negotiations.	1.10
12/06/2023	D. Harlan	B190	Perform document review.	5.60
12/06/2023	D. Harlan	B320	Researching relevant information and drafting disclosure statement.	6.50
12/06/2023	C. Stephenson	B320	Research and analysis regarding plan of reorganization.	2.30
12/06/2023	E. Weaver	B130	Draft and file certificate of no objection to motion for order authorizing sale of personal property (.4); finalize and file propose order regarding same (.2).	0.60
12/06/2023	E. Weaver	B190	Finalize and file notice of appearance and suggestion of bankruptcy in the PQPR Holdings adversary.	0.60
12/06/2023	J. Yoon	B190	Call with the Court and coordinate PHV filings for Deric J. McClellan and Chris Davis.	0.50

Jones, Alex "AJ"

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Vickie L. Driver

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12/07/2023	L. Dauphin	B190	Prepare supplemental client document production.	1.00
12/07/2023	D. Harlan	B190	Edit formatting on privilege log.	4.50
12/07/2023	D. Harlan	B320	Draft disclosure statement.	3.80
12/07/2023	E. Weaver	B130	Review order granting motion for sale of property free and clear of liens and circulate same to team.	0.20
12/07/2023	E. Weaver	B190	Finalize and file motion for pro hac vice for Chris Davis and Deric McClellan in both adversary cases.	0.60
12/08/2023	L. Dauphin	B190	Revise supplemental client document production.	0.30
12/08/2023	L. Dauphin	B190	Conference related to privilege log preparation and export from Everlaw.	0.20
12/08/2023	V. Driver	B190	Work through creditor terms, settlement offers, and plan terms for drafting and structure.	3.50
12/08/2023	D. Harlan	B190	Edit formatting on privilege log.	3.80
12/08/2023	D. Harlan	B320	Draft disclosure statement.	4.10
12/08/2023	C. Stephenson	B160	Review and revise billing.	1.70
12/08/2023	C. Stephenson	B170	Meeting with financial advisor regarding fee objections (.8); call regarding same (.3).	1.10
12/08/2023	C. Stephenson	B320	Meeting with financial advisor regarding plan issues.	2.80
12/09/2023	D. Harlan	B320	Draft disclosure statement.	1.80
12/10/2023	D. Harlan	B320	Draft disclosure statement.	2.50
12/11/2023	V. Driver	B110	Review emails on UCC Crypto issues and respond briefly.	0.40
12/11/2023	V. Driver	B190	Calls with potential transferees negotiating potential settlement and discussing defenses (.9); emails with counsel for the Texas plaintiffs regarding suggestion of BK filed in	1.50

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Vickie L. Driver

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			PQPR lawsuit (.4); emails on Greenleaf trust issues raised by K. Jones (.2).	
12/11/2023	V. Driver	B195	Travel from Austin to Dallas (billed at half-time 3.8).	1.90
12/11/2023	V. Driver	B210	Call with Whiskey partner on issues with margins and new contract (.5); emails regarding same (.1).	0.60
12/11/2023	D. Harlan	B195	Travel to Austin (billed at half time).	3.00
12/11/2023	D. Harlan	B320	Draft disclosure statement.	3.10
12/11/2023	C. Stephenson	B195	Travel from Dallas to Austin [6.0 billed at half time].	3.00
12/11/2023	E. Weaver	B160	Review compensation order and begin drafting second interim fee application of C&D.	1.80
12/12/2023	V. Driver	B130	Emails with UCC regarding personal property sales and cost (.3); discuss rates and notices needed for sales (.4).	0.70
12/12/2023	V. Driver	B210	Discussion regarding potential marketing deals.	0.40
12/12/2023	V. Driver	B320	Analyze strategy regarding plan terms and meetings with client and constituents on plan term options (3.2); review and revise plan (3.6).	6.80
12/12/2023	D. Harlan	B320	Draft disclosure statement.	8.00
12/12/2023	C. Stephenson	B320	Attend plan working meetings and discussions (3.8); revise plan draft (2.6).	6.40
12/12/2023	E. Weaver	B130	Prepare outline of notice procedures for proposed sale of personal property and circulate to team.	0.60
12/12/2023	E. Weaver	B160	Draft ninth monthly fee statement of BlackBriar Advisors.	2.00
12/12/2023	E. Weaver	B160	Finalize draft of second interim fee application of C&D and circulate for approval.	2.00
12/13/2023	V. Driver	B110	Call with K. Porter on extension to exemption	0.20

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			objection .2.	
12/13/2023	V. Driver	B160	Review and analyze fee app filings and pro rata sharing for payments.	0.40
12/13/2023	V. Driver	B190	Call with counsel for potential transferee to discuss settlement (.9); discuss same with client (.7).	1.60
12/13/2023	V. Driver	B195	Travel from Austin to Dallas (billed at half-time 3.8).	1.90
12/13/2023	V. Driver	B210	Call with Wulff on bourbon contract and issues with same.	0.40
12/13/2023	V. Driver	B320	Review and revise plan (3.7); meeting with client explaining and describing plan and taking comments to same (1.1); strategy discussion on plan terms with co-counsel (.7).	5.50
12/13/2023	D. Harlan	B195	Travel to Dallas (3.8 billed at half time).	1.90
12/13/2023	D. Harlan	B320	Draft disclosure statement.	8.00
12/13/2023	C. Stephenson	B195	Travel from Austin to Dallas [3.8 billed at half-time].	1.90
12/13/2023	C. Stephenson	B320	Draft and revise plan of reorganization (3.2); draft related correspondence (1.1); client meeting regarding same (1.8).	6.10
12/13/2023	E. Weaver	B160	Draft second interim fee application of BlackBriar Advisors.	3.40
12/13/2023	J. Yoon	B160	Review the interim compensation procedures order in preparation to draft interim fee statements for The Reynal Law firm and Martin, Disiere, Jefferson & Wisdom LLP (0.4); draft and revise the same (0.7).	1.10
12/14/2023	V. Driver	B190	Call with counsel for transferee on potential settlement.	0.90
12/14/2023	V. Driver	B320	Review and revise plan and analyze revisions needed. (3.6); call with committee on plan	4.30

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			filing. (.7)	
12/14/2023	D. Harlan	B320	Proofreading and eliminating formatting issues on the Plan.	3.80
12/14/2023	C. Stephenson	B320	Draft and revise Plan of Reorganization (3.3); review and respond to related correspondence (1.8).	5.10
12/14/2023	E. Weaver	B130	Email correspondence to BlackBriar Advisors regarding employment of auctioneer.	0.10
12/14/2023	E. Weaver	B160	Finalize draft of motion to employ auctioneer and circulate for approval.	0.80
12/14/2023	J. Yoon	B160	Draft and revise interim fee statements for the Reynal Law Firm and Martin, Disiere, Jefferson & Wisdom LLP.	1.50
12/15/2023	V. Driver	B110	Review and approve exemption deadline extension.	0.40
12/15/2023	V. Driver	B320	Review and revise plan and prepare for filing (2.7); calls and emails with various constituencies on comments and finalizing plan for filing (1.9).	4.60
12/15/2023	D. Harlan	B320	Review and format Plan.	3.60
12/15/2023	D. Harlan	B320	Draft disclosure statement.	4.00
12/15/2023	T. Rinck	B320	Draft Table of Contents based upon analysis of the Debtor's Plan of Reorganization.	5.20
12/15/2023	C. Stephenson	B320	Review and finalize Plan of Reorganization.	4.80
12/15/2023	E. Weaver	B110	Review email correspondence from US Trustee's office regarding remaining bank statements and accounts needed (.1); compare with bank statements previously sent to their office (.4).	0.50
12/15/2023	E. Weaver	B110	Review fifth stipulation extending motion to objection to exemptions and docket deadline for same.	0.20

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12/15/2023	E. Weaver	B110	Electronic case filing management.	0.60
12/15/2023	E. Weaver	B160	Revise, finalize and file second interim fee application for BlackBriar Advisors and serve same.	1.80
12/15/2023	E. Weaver	B320	Finalize and file AJ's plan of reorganization (.6); review UCC's plan of liquidation and circulate to team (.2).	0.80
12/15/2023	E. Weaver	B320	Review email correspondence regarding opt-in-settlement for unsecured claims and begin working on exhibit to plan (.4); begin drafting motion to seal plan exhibit (1.0).	1.40
12/16/2023	D. Harlan	B320	Draft disclosure statement.	2.00
12/17/2023	D. Harlan	B320	Draft disclosure statement.	4.70
12/18/2023	V. Driver	B160	Emails on retainers and issues on Martin and Reynal fee statements.	0.40
12/18/2023	V. Driver	B190	Emails with UCC on open discovery requests and related information requests.	1.30
12/18/2023	V. Driver	B210	Revise employment agreement.	1.40
12/18/2023	V. Driver	B320	Disclosure Statement drafting (1.7); calls with claimants seeking input on plan and terms for potential settlement (.9); responding to emails from UCC on plan clarifications (.4); reviewing plan and start amendments to address issues (.6).	3.20
12/18/2023	D. Harlan	B160	Edit Motion to Employ Broker for Ranch property.	0.80
12/18/2023	D. Harlan	B320	Edit initial draft of disclosure statement.	4.80
12/18/2023	D. Harlan	B320	Draft confirmation order.	5.20
12/18/2023	E. Weaver	B110	Review spreadsheet received from BlackBriar Advisors and draft October monthly operating report.	2.00
12/18/2023	E. Weaver	B320	Review draft disclosure statement and prepare list of exhibits (.3); circulate same to team	0.40

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(.1).

12/18/2023	J. Yoon	B160	Draft and revise consolidated interim fee statements for Martin, Disiere, Jefferson & Wisdom LLP and proposed order granting the same.	3.70
12/18/2023	J. Yoon	B160	Draft and revise consolidated interim fee statements for The Reynal Law Firm and proposed order granting the same.	3.20
12/19/2023	V. Driver	B320	Edit Disclosure Statement (4.3); working on liquidation analysis. (.8)	5.10
12/19/2023	D. Harlan	B160	Edit Motion to Employ Broker for sale of Ranch property.	0.50
12/19/2023	D. Harlan	B320	Edit Disclosure Statement.	3.90
12/19/2023	D. McClellan	B320	Draft section discussing Connecticut adversary action for disclosure filing.	1.50
12/19/2023	C. Stephenson	B160	Review and revise October and November billing (4.8); draft related correspondence (1.1).	5.90
12/19/2023	E. Weaver	B110	Finalize and file October monthly operating report.	0.60
12/20/2023	V. Driver	B210	Email seeking clarification on employment agreement term from employment counsel (.4); revise contract regarding same. (.4)	0.80
12/20/2023	V. Driver	B320	Internal call working through group comments and questions on Disclosre Statement draft (1.3); Call with claimants on points and issues (.7); call with subV Trustee counsel on status (.8); review and revise Disclosure Statement and preparing for filing (1.8).	4.60
12/20/2023	D. Harlan	B130	Edit the Motion to Employ Auctioneer to Sell Contents of Storage Units.	1.10
12/20/2023	D. Harlan	B310	Review UCC's Plan for potential objections.	1.50
12/20/2023	D. Harlan	B310	Draft objections to Creditors' Plan.	3.00

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12/20/2023	D. Harlan	B320	Edit Disclosure Statement.	7.00
12/20/2023	D. Harlan	B320	Call with FA and other attorneys regarding disclosure statement edits.	1.10
12/20/2023	D. McClellan	B320	Draft section discussing Texas adversary action for disclosure filing.	0.50
12/20/2023	C. Stephenson	B320	Review and revise Disclosure Statement (3.3); calls and correspondence regarding same (1.8).	5.10
12/20/2023	E. Weaver	B160	Finalize and file first monthly fee statement of the Reynal Law Firm, P.C. and serve same.	0.60
12/21/2023	V. Driver	B110	Correspondence regarding seal schedules; (.2) correspond with UCC on same (.2).	0.40
12/21/2023	V. Driver	B320	Working on Disclosure Statement and plan issues.	3.20
12/21/2023	D. Harlan	B310	Draft objections to Creditors' Plan.	2.00
12/21/2023	D. Harlan	B320	Edit disclosure statement.	3.80
12/21/2023	D. McClellan	B320	Draft section discussing Texas adversary action for disclosure filing.	1.20
12/21/2023	C. Stephenson	B320	Review and revise Disclosure Statement (2.3); draft related correspondence (1.8); calls regarding same (1.2).	5.30
12/21/2023	E. Weaver	B160	Finalize and file tenth monthly fee statement of C&D and serve via email to notice parties.	0.80
12/21/2023	E. Weaver	B160	Finalize and file employment application for Keller Williams Realty and serve via email to notice parties.	0.60
12/21/2023	E. Weaver	B160	Finalize and file employment application for Davis Auctioneers and serve via email to notice parties.	0.60
12/21/2023	E. Weaver	B320	Finalize and file proposed Disclosure Statement.	0.60
12/22/2023	D. Harlan	B320	Draft objections to Creditors' Plan.	3.00

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12/22/2023	D. Harlan	B320	Perform research related to UCC Plan objections.	4.40
12/26/2023	V. Driver	B210	Emails with FSS counsel on setting employment motion.	1.00
12/26/2023	D. Harlan	B320	Research related to UCC Plan objections.	3.40
12/26/2023	D. Harlan	B320	Draft objections to Creditors' Plan.	2.00
12/26/2023	D. Harlan	B320	Call regarding UCC plan objections.	0.50
12/27/2023	D. Harlan	B320	Draft objections to Creditors' Plan.	4.60
12/27/2023	D. Harlan	B320	Research related to UCC Plan objections.	3.50
12/27/2023	C. Stephenson	B320	Draft correspondence regarding plan research issues.	0.80
12/27/2023	J. Yoon	B230	Analyze and review Youngevity document production and responses in preparation for analysis (1.0); draft email analysis regarding Youngevity document production and objections (.5).	1.50
12/27/2023	J. Yoon	B320	Research plan issues regarding class treatment.	2.80
12/28/2023	D. Harlan	B160	Email financial advisor about property sale motions.	0.20
12/28/2023	D. Harlan	B320	Research related to UCC Plan objections.	3.50
12/28/2023	D. Harlan	B320	Discuss objections to UCC Plan.	0.50
12/28/2023	D. Harlan	B320	Edit objections to Creditors' Plan.	2.80
12/28/2023	C. Stephenson	B170	Call and correspondence with financial advisor regarding fee objections.	1.30
12/28/2023	C. Stephenson	B320	Review and analyze plan research (1.8); review and analyze UCC Plan (2.2); call and correspondence regarding same (.9); review plan objections (1.3).	5.20
12/29/2023	V. Driver	B140	Review and analyze email from IRS on refunds and status of IRS (.6); respond to same (.4); call with FA regarding same. (.3)	1.30

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12/29/2023	D. Harlan	B320	Edit objections to Creditors' Plan.	2.80
12/29/2023	D. Harlan	B320	Perform research related to UCC Plan objections.	2.50
12/29/2023	D. Harlan	B320	Research governing case law authorities on ability of debtor with non-dischargeable debt to include broad, permanent plan injunction.	3.10
12/29/2023	C. Stephenson	B170	Call and correspondence regarding objections to UCC professional fees.	1.40
12/30/2023	D. Harlan	B320	Perform and analyze Plan research.	5.10
12/31/2023	D. Harlan	B320	Perform and analyze Plan research.	3.30
Total Hours				419.50
Total Fees for this Invoice				\$183,603.50

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	6.90	2,735.50	Bankruptcy - Case Administration
B130	5.40	2,017.50	Bankruptcy - Asset Disposition
B140	1.70	1,351.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B160	36.10	14,413.50	Bankruptcy - Fee/Employment Applications
B170	7.60	4,862.00	Bankruptcy - Fee/Employment Objections
B190	104.60	40,561.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)

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SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B195	13.60	7,896.50	Bankruptcy - Non-Working Travel
B210	4.60	3,657.00	Bankruptcy - Business Operations
B230	1.50	427.50	Bankruptcy - Financing/Cash Collections
B310	6.50	1,820.00	Bankruptcy - Claims Administration and Objections
B320	231.00	103,861.00	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	419.50	\$183,603.50	

12/06/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month November 2023	\$5,005.00
12/11/2023	Harlan, Danielle reimbursement of 11/29/2023 uber expense	17.72
12/22/2023	Texas Southern Bankruptcy Court for Filing Fee for Motion to Sell Personal Property 11/14/2023	188.00
12/22/2023	Texas Southern District Court for filing for Pro Hac Vice for Chris Davis- CT Appeal 12/7/2023	100.00
12/22/2023	Texas Southern District Court for filing for Pro Hac Vice for Derric McClellan- CT Appeal 12/7/2023	100.00
12/22/2023	Texas Southern District Court for filing for Pro Hac Vice for Chris Davis- CT Appeal 12/7/2023	100.00
12/22/2023	Texas Southern District Court for filing for Pro Hac Vice for Derric McClellan - CT Appeal 12/7/2023	100.00
12/28/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for Client Meeting 12/11-13/2023; 404 miles .655/mile= \$ 264.62,	1,788.92

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	lodging \$ 1142.50 and meals \$ 381.80	
12/29/2023	Harlan, Danielle reimbursement of travel expenses to Houston Texas for depositions 11/26-29/2023; transportation \$ 764.17 and meals \$ 162.17	926.34
01/05/2024	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of December 2023	5,031.00
01/25/2024	Esquire Deposition Solutions for deposition 9/12/2023	1,434.85
01/25/2024	Esquire Deposition Solutions for depositions 9/13/2023	1,586.35
01/25/2024	Digital Mountain for document storage	180.00
Subtotal of Expenses		<u>\$16,558.18</u>
Online Research		<u>\$247.80</u>
Subtotal of Costs		<u>\$247.80</u>
Total Expenses and Costs for this Invoice		<u>\$16,805.98</u>

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E106	247.80	On-line research
E110	2,732.98	Out-of-town travel
E112	588.00	Court fees
E115	3,021.20	Deposition transcripts
E118	10,036.00	Litigation support vendors
E123	180.00	Other professionals
Total	<u>\$16,805.98</u>	

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Total For This Invoice

\$200,409.48

SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
L. Dauphin	1.90	185.00	351.50
T. Rinck	5.20	200.00	1,040.00
D. McClellan	45.20	310.00	14,012.00
V. Driver	67.50	795.00	53,662.50
C. Stephenson	66.60	715.00	47,619.00
E. Weaver	31.80	295.00	9,381.00
R. Yates	2.60	340.00	884.00
J. Davis	4.50	475.00	2,137.50
J. Yoon	28.00	285.00	7,980.00
D. Harlan	166.20	280.00	46,536.00
Total	419.50		\$183,603.50